

Exhibit D

Exhibit D

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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

16 IN RE CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

18 This Document Relates To:

19 *Target Corp., v. Technicolor SA, et al.,*
20 Case No. 13-cv-05686-SC

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 13-cv-05686

**PLAINTIFF TARGET CORP.'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS MITSUBISHI ELECTRIC
CORPORATION, MITSUBISHI
ELECTRONIC VISUAL SOLUTIONS
AMERICA, INC., AND MITSUBISHI
ELECTRIC US, INC.'S FIRST SET OF
INTERROGATORIES**

24 PROPOUNDING PARTY: Defendants Mitsubishi Electric Corporation, Mitsubishi Electronic
25 Visual Solutions America, Inc., and Mitsubishi Electric US, Inc.

26 RESPONDING PARTY: Plaintiff Target Corp.

27 SET NO.: ONE
28

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Target
2 Corp. ("Target") hereby responds to the First Set of Interrogatories to Plaintiff Target
3 ("Interrogatories") served by counsel for Defendants Mitsubishi Electric Corporation, Mitsubishi
4 Electronic Visual Solutions America, Inc., and Mitsubishi Electric US, Inc. (collectively the
5 "Defendants") in the above-captioned matter. For the reasons specified below, Target objects
6 generally and specifically to all specifications in the Interrogatories. Target reserves the right to
7 supplement the objections and responses set forth below.

8 GENERAL OBJECTIONS

9 Target asserts the following General Objections to the Interrogatories, including the
10 Instructions and the Definitions, which are incorporated by reference in each specific response as
11 though set forth fully therein:

12 1. Target objects to the Interrogatories to the extent that they are overbroad,
13 burdensome, and seek information that is outside the scope of any allowable discovery by the
14 Federal Rules of Civil Procedure, the Local Rules of the District Court for the Northern District
15 of California, or any order of this Court. Target specifically objects to the instruction to serve
16 verified answers at the offices of Jenner & Block, LLP, Attn: Shaun M. Van Horn, 353 N. Clark
17 Street, Chicago, Illinois 60654 within thirty (30) days after the date of service. Target does not
18 agree to undertake any obligations beyond those required by the Federal Rules of Civil Procedure
19 or the Local Rules of this Court.

20 2. Target objects to the Interrogatories to the extent that they seek information
21 protected by the attorney-client privilege and/or attorney work-product doctrine, the joint
22 prosecution privilege, or any other privilege or doctrine of confidentiality provided by law, or that
23 otherwise constitutes information prepared for or in anticipation of litigation. Such information
24 will not be produced; any production thereof is inadvertent and not a waiver of any applicable
25 privilege or protection against disclosure.

26 3. Target objects to the Interrogatories to the extent that they duplicate other
27 interrogatories, in whole or in part, made by other defendants in this matter, in violation of the
28 integration order included in section XV, subsections D and E of the Court's "Order Re

1 Discovery and Case Management Protocol,” entered in the MDL on April 3, 2012. Order Re
2 Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust Litigation*, Case
3 No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128.

4 4. Target objects to the Interrogatories to the extent that they seek information not
5 currently in Target’s possession, custody, or control.

6 5. Target objects to the Interrogatories to the extent that they seek information
7 already in the possession, custody or control of the defendants.

8 6. Target objects to the Interrogatories to the extent that they are unreasonable,
9 oppressive, unintelligible, vague, ambiguous, and unduly burdensome and for which the
10 acquisition of information responsive to each would cause Target undue annoyance and expense.

11 7. Target objects to the Interrogatories to the extent that they seek information not
12 related to the claims or defenses of any party in this matter or are not reasonably calculated to
13 lead to the discovery of admissible evidence.

14 8. Target objects to the Interrogatories to the extent that the information sought is
15 unreasonably cumulative or duplicative, or is obtainable from a source other than Target that is
16 more convenient, less burdensome, or less expensive. Target also objects to the Interrogatories to
17 the extent that they seek information that can be more easily obtained by Defendants from public
18 sources.

19 9. Target objects to the Interrogatories to the extent that they contain terms that are
20 vague or ambiguous. Target also objects to Defendants’ definitions of words to the extent that
21 they are inconsistent with the plain meaning of those words or impose an expanded definition of
22 the words or phrases. By responding to an Interrogatory containing such definitions, Target does
23 not adopt the definitions of the terms propounded by Defendants. Instead, Target expressly
24 reserves its right to narrow the scope of the purported definition.

25 10. Target specifically objects to the definitions of “All,” “And,” “Or,” “Location,”
26 “Document,” “You,” “Your,” “Yourself,” “Identify,” “Person,” “Relevant Period,” “Describe,”
27 and “Relate” to the extent that such definitions make the Interrogatories overly broad, unduly
28 burdensome, or seek information that is not relevant to the subject matter of this litigation and,

1 therefore, render the Interrogatories not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 11. Target objects to the Interrogatories to the extent that they call for the disclosure of
4 information containing trade secrets or proprietary, sensitive, or other confidential business
5 information.

6 12. Target objects to the Interrogatories to the extent that they seek legal conclusions
7 and supporting facts that are not reasonably ascertainable or available at this stage of the
8 litigation.

9 13. Target objects to the Interrogatories to the extent that they call for expert
10 testimony. Target will provide expert disclosures as provided by the Federal Rules of Civil
11 Procedure or by order of the Court, and at the appropriate time.

12 14. Target objects to the Interrogatories to the extent that they would require Target to
13 disclose information that would cause Target to violate its existing contractual obligations to
14 other parties to maintain the confidentiality of such information.

15 15. Target objects to the Interrogatories to the extent Defendants are drawing a
16 distinction between CRTs and CRT products. Target interprets all requests related to CRTs to
17 include its purchases of CRT products, which contain CRTs.

18 16. Target objects to the Interrogatories to the extent that they are premature. In
19 responding to such Interrogatories, Target in no way concedes their relevance to the merits and
20 expressly reserves other objections to those Interrogatories. These responses are being made after
21 reasonable inquiry into the relevant facts, and are based only upon the information and
22 documentation that is presently known to Target. Further investigation and discovery may result
23 in the identification of additional information, and Target reserves the right to modify its
24 responses. Target's responses should not be construed to prejudice its right to conduct further
25 investigation in this case, or to limit their use of any additional evidence that exists in the record
26 of these MDL proceedings.

27 17. Target objects to Instruction I to the extent that it purports to require information
28 protected by the attorney-client privilege and/or attorney work-product doctrine, the joint

1 prosecution privilege, or any other privilege or doctrine of confidentiality provided by law, or that
2 otherwise constitutes information prepared for or in anticipation of litigation. Such information
3 will not be produced; any production thereof is inadvertent and not a waiver of any applicable
4 privilege or protection against disclosure.

5 18. Target objects to Instruction 2 as overly broad, unduly burdensome, oppressive,
6 and outside the scope of discovery allowed by the Federal Rules of Civil Procedure to the extent
7 that it purports to require Target to describe its process for responding to Interrogatories. Target
8 further objects to Instruction 2 to the extent that it purports to require information protected by the
9 attorney-client privilege and/or attorney work-product doctrine, the joint prosecution privilege, or
10 any other privilege or doctrine of confidentiality provided by law, or that otherwise constitutes
11 information prepared for or in anticipation of litigation.

12 19. Target objects to Instruction 3 as overly broad, unduly burdensome, oppressive,
13 and outside the scope of discovery allowed by the Federal Rules of Civil Procedure to the extent
14 that it purports to require that Target provide information that is outside the scope of any
15 allowable discovery by the Federal Rules of Civil Procedure, the Local Rules of the District Court
16 for the Northern District of California, or any order of this Court.

17 20. Target objects to Instruction 4 as overly broad, unduly burdensome, oppressive,
18 and outside the scope of discovery allowed by the Federal Rules of Civil Procedure to the extent
19 that it purports to require Target to describe its process for responding to Interrogatories. Target
20 further objects to Instruction 4 to the extent that it purports to require information protected by the
21 attorney-client privilege and/or attorney work-product doctrine, the joint prosecution privilege, or
22 any other privilege or doctrine of confidentiality provided by law, or that otherwise constitutes
23 information prepared for or in anticipation of litigation. Target further objects to Instruction 4 to
24 the extent it purports to require Target to fully respond to Interrogatories that are premature.

25 21. Target objects to Instruction 5 as overly broad, unduly burdensome, oppressive,
26 and outside the scope of discovery allowed by the Federal Rules of Civil Procedure to the extent
27 that it purports to require Target to describe its process for responding to Interrogatories. Target
28

1 further objects to Instruction 5 to the extent it purports to require Target to fully respond to
2 Interrogatories that are premature.

3 22. Target objects to Instructions 6 and 7 as overly broad, unduly burdensome,
4 oppressive, and outside the scope of discovery allowed by the Federal Rules of Civil Procedure,
5 particularly in that they seek information that is not relevant to the subject matter of this litigation.

6 23. Target objects to Instruction 8 as overly broad, unduly burdensome, oppressive,
7 and outside the scope of discovery allowed by the Federal Rules of Civil Procedure, particularly
8 in that it purports to require Target to specifically identify and certify portions of business
9 records. Documents produced by Target in this litigation shall be deemed produced in response
10 to these Interrogatories, subject to the responses and objections contained herein. The burden of
11 identifying specific information or documents responsive to these Interrogatories from documents
12 produced in the course of this litigation is substantially the same for either party, and Target is
13 entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal
14 Rules of Civil Procedure. Target does not agree to undertake any obligations beyond those
15 required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

16 RESPONSES TO INTERROGATORIES

17 INTERROGATORY NO. 1:

18 Identify any alleged "Glass Meetings" (as alleged in ¶¶ 117-131 of the Complaint) that
19 You contend Mitsubishi Electric Employees attended, by stating the time, date and location of the
20 meeting, Identifying the Persons who attended any such "Glass Meetings," and Identifying any
21 statements that You contend were made by Mitsubishi Electric Employees that You contend
22 constitute evidence in support of the conspiracy alleged in the Complaint.

23 RESPONSE TO INTERROGATORY NO. 1:

24 Target refers to and incorporates its General Objections as though set forth fully herein.
25 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
26 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
27 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
28 to the extent that it is duplicative of other discovery propounded by other defendants in MDL No.

1 1917. Target further objects to this Interrogatory to the extent that it seeks information protected
2 by the attorney-client privilege or work-product doctrine. Target further objects to this
3 Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or
4 control, or equally available to Defendants. Target also objects to this Interrogatory on the
5 grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

6 Subject to and without waiving the foregoing objections, Target states that the documents
7 and transactional data produced in this litigation shall be deemed produced in response to this
8 Interrogatory, subject to the response and objections contained herein. Target further states that
9 the response to this Interrogatory may include the transactional data and documents produced by
10 defendants, co-conspirators, and third parties in MDL No. 1917. The burden of identifying
11 specific documents responsive to this Interrogatory from a review of the documents and data
12 identified in this response is the substantially the same for Target or Defendants. Target further
13 states that information responsive to this Interrogatory is contained in the following, which Target
14 hereby incorporates by reference:

- 15 • The documents produced in this litigation and listed by Target in its response to
16 Interrogatory No. 1 of its Responses and Objections to Defendants Panasonic
17 Corporation of North America and Koninklijke Philips N.V.'s First Set of
18 Interrogatories, dated July 21, 2014.
- 19 • Expert report of Dr. Kenneth G. Elzinga dated April 15, 2014 and accompanying
20 materials.
- 21 • Expert Report of Dr. Kenneth G. Elzinga dated August 5, 2014 and accompanying
22 materials.
- 23 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
24 Set of Interrogatories, No. 5 (February 10, 2012);
- 25 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
26 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
27 2013);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 3 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 5 • Koninklijke Philips Electronics N.V. to Responses and Objections to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 7 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 8 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 9 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 10 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 11 Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 13 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 15 Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 17 Interrogatories (November 2, 2011);
- 18 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 19 Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 20 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 21 Interrogatories (December 23, 2011);
- 22 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories, Interrogatories Nos. 4 and 5;
- 24 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories, Interrogatories Nos. 4 and 5;
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 4 Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 15 • The European Commission Report on the CRT Conspiracy;
- 16 • Attachment A to Certain Direct Action Plaintiffs' Responses to Various
- 17 Interrogatories, served herewith; and
- 18 • The Chart attached as Exhibit A to these responses.

19 Target also incorporates by reference the responses of all other plaintiffs in this matter,
 20 including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct
 21 Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants
 22 in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its
 23 response to this Interrogatory as appropriate.

24 **INTERROGATORY NO. 2:**

25 For the alleged communication on December 4, 1995 (alleged in ¶ 149, bullet 1):

- 26 a. Identify all Persons, including Mitsubishi Electric Employees and Chunghwa
- 27 Employees, that participated in this communication.
- 28

- b. Identify all Documents, other than CHU00028558, Related to this communication.
- c. Identify all percipient witness statements or testimony Related to this communication.
- d. Describe all actions and statements that occurred during this communication.

RESPONSE TO INTERROGATORY NO. 2:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and "state its case" in responses to written discovery. Target further objects to this Interrogatory on the ground that the term "related to" is vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Pursuant to Fed. R. Civ. P. 33(d), Target directs Defendants to CHU00028558. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 3:

For the alleged visit on November 21, 1996 (alleged in ¶ 149, bullet 2):

- a. Identify all Persons, including Mitsubishi Electric Employees and Chunghwa Employees, that participated in this visit.
- b. Identify all Documents, other than CHU00028548, Related to this visit.
- c. Identify all percipient witness statements or testimony Related to this visit.
- d. Describe all actions and statements that occurred during this communication, including by Identifying any information exchanged by the participants in connection with this visit.

RESPONSE TO INTERROGATORY NO. 3:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and "state its case" in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms "actions," "visit," "related to," and "describe" are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Pursuant to Fed. R. Civ. P. 33(d), Target directs Defendants to CHU00028548. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 4:

For the alleged exchange on December 18, 1998 (alleged in ¶ 1149, bullet 3):

- a. Identify all Persons, including Mitsubishi Electric Employees and Chunghwa Employees, that participated in this exchange.
- b. Identify all Documents, other than CHU000285323, Related to this exchange.
- c. Identify all percipient witness statements or testimony Related to this exchange.
- d. Describe all actions and statements that occurred during this exchange, including by Identifying any information exchanged by the participants in connection with this exchange.

RESPONSE TO INTERROGATORY NO. 4:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “exchange,” “related to,” and “describe” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Pursuant to Fed R. Civ. P. 33(d), Target directs Defendants to CHU00028532. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or

1 amend its response to this Interrogatory as appropriate.

2 **INTERROGATORY NO. 5:**

3 For the alleged meeting on August 29, 2000 (alleged in ¶ 149, bullet 4):

- 4 a. Identify all Persons, including Mitsubishi Electric Employees and SDI Samsung
- 5 Employees, that participated in this meeting.
- 6 b. Identify all Documents Related to this meeting.
- 7 c. Identify all percipient witness statements or testimony Related to this meeting.
- 8 d. Describe all actions and statements that occurred during this meeting.

9 **RESPONSE TO INTERROGATORY NO. 5:**

10 Target refers to and incorporates its General Objections as though set forth fully herein.
 11 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 12 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 13 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
 14 on the grounds that the terms “actions,” “identify,” “related to,” and “describe” are vague,
 15 ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is
 16 duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further
 17 objects to this Interrogatory to the extent that it seeks information protected by the attorney-client
 18 privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it
 19 seeks information that is in Defendants’ possession, custody, or control, or equally available to
 20 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 21 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

22 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 23 its responses to Interrogatory No. 1. Target directs Defendants to Samsung SDI Supplemental
 24 Response to the DPPs’ Interrogatory No. 5. Target also incorporates by reference the responses
 25 of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect
 26 Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 27 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 28 the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 6:

For the alleged meeting on October 24, 2000 (alleged in ¶ 149, bullet 5):

- a. Identify all Persons, including Mitsubishi Electric Employees and Toshiba Employees, that participated in this meeting.
- b. Identify all Documents Related to this meeting.
- c. Identify all percipient witness statements or testimony Related to this meeting.
- d. Describe all actions and statements that occurred during this meeting, including by Identifying any “proprietary information” shared in connection with this meeting.

RESPONSE TO INTERROGATORY NO. 6:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Target directs Defendants to Toshiba Corporation’s Supplemental Response to DPP’s Interrogatory No. 5. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target

1 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

2 **INTERROGATORY NO. 7:**

3 For the alleged meeting on November 15, 2000 (alleged in ¶ 149, bullet 6):

- 4 a. Identify all Persons, including Mitsubishi Electric Employees and Toshiba
- 5 Employees, that participated in this meeting.
- 6 b. Identify all Documents Related to this meeting.
- 7 c. Identify all percipient witness statements or testimony Related to this meeting.
- 8 d. Describe all actions and statements that occurred during this meeting, including
- 9 by identifying any "proprietary information" shared in connection with this
- 10 meeting.

11 **RESPONSE TO INTERROGATORY NO. 7:**

12 Target refers to and incorporates its General Objections as though set forth fully herein.
 13 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 14 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 15 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
 16 on the grounds that the terms "actions," "related to," and "describe" are vague, ambiguous, and
 17 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 18 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 19 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 20 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 21 information that is in Defendants' possession, custody, or control, or equally available to
 22 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 23 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

24 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 25 its responses to Interrogatory No. 1. Target directs Defendants to Toshiba Corporation's
 26 Supplemental Response to DPP's Interrogatory No. 5. Target also incorporates by reference the
 27 responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the
 28 Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially

1 similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target
2 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate."

3 **INTERROGATORY NO. 8:**

4 For the alleged meeting on January 24, 2001 (alleged in ¶ 149, bullet 7):

- 5 a. Identify all Persons, including Mitsubishi Electric Employees and Toshiba
6 Employees, that participated in this meeting.
- 7 b. Identify all Documents Related to this meeting.
- 8 c. Identify all percipient witness statements or testimony Related to this meeting.
- 9 d. Describe all actions and statements that occurred during this meeting, including
10 by Identifying any "proprietary information" shared in connection with this
11 meeting.

12 **RESPONSE TO INTERROGATORY NO. 8:**

13 Target refers to and incorporates its General Objections as though set forth fully herein.
14 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
15 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
16 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
17 on the grounds that the terms "actions," "related to," and "describe" are vague, ambiguous, and
18 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
19 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
20 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
21 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
22 information that is in Defendants' possession, custody, or control, or equally available to
23 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
24 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

25 Subject to and without waiving the foregoing objections, Target refers to and incorporates
26 its responses to Interrogatory No. 1. Target directs Defendants to Toshiba Corporation's
27 Supplemental Response to DPP's Interrogatory No. 5. Target also incorporates by reference the
28 responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the

1 Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially
 2 similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target
 3 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

4 **INTERROGATORY NO. 9:**

5 For the alleged meeting on March 6, 2001 (alleged in ¶ 149, bullets 8):

- 6 a. Identify all Persons, including Mitsubishi Electric Employees and Toshiba
 7 Employees, that participated in this meeting.
- 8 b. Identify all Documents Related to this meeting.
- 9 c. Identify all percipient witness statements or testimony Related to this meeting.
- 10 d. Describe all actions and statements that occurred during this meeting, including
 11 by Identifying any "proprietary information" shared in connection with this
 12 meeting.

13 **RESPONSE TO INTERROGATORY NO. 9:**

14 Target refers to and incorporates its General Objections as though set forth fully herein.
 15 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 16 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 17 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
 18 on the grounds that the terms "actions," "identify," "related to," and "describe" are vague,
 19 ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is
 20 duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further
 21 objects to this Interrogatory to the extent that it seeks information protected by the attorney-client
 22 privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it
 23 seeks information that is in Defendants' possession, custody, or control, or equally available to
 24 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 25 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

26 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 27 its responses to Interrogatory No. 1. Target directs Defendants to Toshiba Corporation's
 28 Supplemental Response to DPP's Interrogatory No. 5. Target also incorporates by reference the

1 responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the
2 Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially
3 similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target
4 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

5 **INTERROGATORY NO. 10:**

6 For the alleged communication on August 2, 2001 (alleged in ¶ 149, bullet 9):

- 7 a. Identify all Persons, including Mitsubishi Electric Employees and Chunghwa
8 Employees, that participated in this communication.
- 9 b. Identify all Documents, other than CHU00031154, Related to this
10 communication.
- 11 c. Identify all percipient witness statements or testimony Related to this
12 communication.
- 13 d. Describe all actions and statements that occurred during this communication,
14 including by Identifying the “Mitsubishi sales strategy” communicated in this
15 communication and by Identifying the “confidential information” provided in
16 connection with this communication.

17 **RESPONSE TO INTERROGATORY NO. 10:**

18 Target refers to and incorporates its General Objections as though set forth fully herein.
19 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
20 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
21 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
22 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and
23 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
24 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
25 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
26 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
27 information that is in Defendants’ possession, custody, or control, or equally available to
28 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have

1 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

2 Subject to and without waiving the foregoing objections, Target refers to and incorporates
3 its responses to Interrogatory No. 1. Pursuant to Fed R. Civ. P. 33(d), Target directs Defendants
4 to CHU00031154. Target also incorporates by reference the responses of all other plaintiffs in
5 this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all
6 other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by
7 all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or
8 amend its response to this Interrogatory as appropriate.

9 **INTERROGATORY NO. 11:**

10 For the alleged communication on October 25, 2001 (alleged in ¶ 149, bullet 10):

- 11 a. Identify all Persons, including Mitsubishi Electric Employees and Samsung SDI
12 Employees, that participated in this communication.
- 13 b. Identify all Documents Related to this communication.
- 14 c. Identify all percipient witness statements or testimony Related to this
15 communication.
- 16 d. Describe all actions and statements that occurred during this communication,
17 including by Identifying the “confidential information” shared in connection with
18 this communication.

19 **RESPONSE TO INTERROGATORY NO. 11:**

20 Target refers to and incorporates its General Objections as though set forth fully herein.
21 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
22 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
23 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
24 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and
25 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
26 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
27 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
28 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks

1 information that is in Defendants' possession, custody, or control, or equally available to
 2 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 3 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

4 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 5 its responses to Interrogatory No. 1. Target directs Defendants to the testimony of Jae In Lee and
 6 Samsung SDI's Supplemental Response to the DPPs' Interrogatory No. 5. Target also
 7 incorporates by reference the responses of all other plaintiffs in this matter, including the Direct
 8 Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the
 9 same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is
 10 ongoing and Target reserves the right to supplement and/or amend its response to this
 11 Interrogatory as appropriate.

12 **INTERROGATORY NO. 12:**

13 For the alleged meeting on December 26, 2002 (alleged in ¶ 149, bullet 11):

- 14 a. Identify all Persons, including Mitsubishi Electric Employees and Toshiba
 15 Employees, that participated in this meeting.
- 16 b. Identify all Documents Related to this meeting.
- 17 c. Identify all percipient witness statements or testimony Related to this meeting.
- 18 d. Describe all actions and statements that occurred during this meeting, including
 19 by identifying any "proprietary information" shared in connection with this
 20 meeting.

21 **RESPONSE TO INTERROGATORY NO. 12:**

22 Target refers to and incorporates its General Objections as though set forth fully herein.
 23 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 24 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 25 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
 26 on the grounds that the terms "actions," "related to," and "describe" are vague, ambiguous, and
 27 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 28 discovery propounded by other defendants in MDL No. 1917. Target further objects to this

1 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 2 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 3 information that is in Defendants' possession, custody, or control, or equally available to
 4 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 5 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

6 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 7 its responses to Interrogatory No. 1. Target directs Defendants to Toshiba Corporation's
 8 Supplemental Response to DPP's Interrogatory No. 5. Target also incorporates by reference the
 9 responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the
 10 Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially
 11 similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target
 12 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

13 **INTERROGATORY NO. 13:**

14 For the alleged meeting on March 3, 2003 (alleged in ¶ 149, bullet 12):

- 15 a. Identify all Persons, including Mitsubishi Electric Employees and SDI Samsung
- 16 Employees, that participated in this meeting.
- 17 b. Identify all Documents Related to this meeting.
- 18 c. Identify all percipient witness statements or testimony Related to this meeting.
- 19 d. Describe all actions and statements that occurred during this meeting, including
- 20 by Identifying any "customers" that were allocated or were discussed for possible
- 21 allocation in connection with this meeting, by Identifying all statements regarding
- 22 "CDT price maintenance" discussed at this meeting, and by Identifying the
- 23 information exchanged in connection with this meeting.

24 **RESPONSE TO INTERROGATORY NO. 13:**

25 Target refers to and incorporates its General Objections as though set forth fully herein.
 26 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 27 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 28 and "state its case" in responses to written discovery. Target further objects to this Interrogatory

1 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and
 2 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 3 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 4 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 5 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 6 information that is in Defendants’ possession, custody, or control, or equally available to
 7 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 8 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

9 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 10 its responses to Interrogatory No. 1. Target directs Defendants to SDCRT-006041 and Samsung
 11 SDI’s Supplemental Response to the DPPs’ Interrogatory No. 5. Target also incorporates by
 12 reference the responses of all other plaintiffs in this matter, including the Direct Purchaser
 13 Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or
 14 substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing
 15 and Target reserves the right to supplement and/or amend its response to this Interrogatory as
 16 appropriate.

17 **INTERROGATORY NO. 14:**

18 For the alleged communication on May 21, 2003 (alleged in ¶ 149, bullet 13):

- 19 a. Identify all Persons, including Mitsubishi Electric Employees, Toshiba
 20 Employees, and Hitachi Employees, that participated in this communication.
- 21 b. Identify all Documents Related to this communication.
- 22 c. Identify all percipient witness statements or testimony Related to this
 23 communication.
- 24 d. Describe all actions and statements that occurred during this communication,
 25 including by Identifying all “coded company references” Mitsubishi Electric
 26 agreed to use, and Identifying which “participating companies’ names”
 27 Mitsubishi Electric agreed to keep secret.

1 **RESPONSE TO INTERROGATORY NO. 14:**

2 Target refers to and incorporates its General Objections as though set forth fully herein.
 3 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 4 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 5 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
 6 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and
 7 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 8 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 9 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 10 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 11 information that is in Defendants’ possession, custody, or control, or equally available to
 12 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 13 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

14 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 15 its responses to Interrogatory No. 1. Pursuant to Fed R. Civ. P. 33(d), Target directs Defendants
 16 to HDP-CRT00026401. Target also incorporates by reference the responses of all other plaintiffs
 17 in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all
 18 other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by
 19 all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or
 20 amend its response to this Interrogatory as appropriate.

21 **INTERROGATORY NO. 15:**

22 For the alleged communication on June 26, 2003 (alleged in ¶ 149, bullet 14):

- 23 a. Identify all Persons, including Mitsubishi Electric Employees, Matsushita
 24 Employees, Hitachi Employees, and Toshiba Employees, that participated in this
 25 communication.
 26 b. Identify all Documents related to this communication.
 27 c. Identify all percipient witness statements or testimony Related to this
 28 communication.

- 1 d. Describe all actions and statements that occurred during this
- 2 e. communication, including by Identifying any agreements referenced in this
- 3 communication to share information.

4 **RESPONSE TO INTERROGATORY NO. 15:**

5 Target refers to and incorporates its General Objections as though set forth fully herein.

6 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.

7 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence

8 and “state its case” in responses to written discovery. Target further objects to this Interrogatory

9 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and

10 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other

11 discovery propounded by other defendants in MDL No. 1917. Target further objects to this

12 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or

13 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks

14 information that is in Defendants’ possession, custody, or control, or equally available to

15 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have

16 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

17 Subject to and without waiving the foregoing objections, Target refers to and incorporates

18 its responses to Interrogatory No. 1. Pursuant to Fed R. Civ. P. 33(d), Target directs Defendants

19 to HDP-CRT00024172. Target also incorporates by reference the responses of all other plaintiffs

20 in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all

21 other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by

22 all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or

23 amend its response to this Interrogatory as appropriate.

24 **INTERROGATORY NO. 16:**

25 For the alleged meeting on March 31, 2004 (alleged in ¶ 149, bullet 15):

- 26 a. Identify all Persons, including Mitsubishi Electric Employees and Samsung SDI
- 27 Employees, Related to this meeting.
- 28 b. Identify all Documents Related to this meeting.

- c. Identify all percipient witness statements or testimony Related to this meeting.
- d. Describe all actions and statements that occurred during this meeting, including by Identifying any information shared at this meeting.

RESPONSE TO INTERROGATORY NO. 16:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Target directs Defendants to Samsung SDI’s Supplemental Response to the DPPs’ Interrogatory No. 5. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 17:

For the alleged meeting on July 1, 2004 (alleged in ¶ 149, bullet 16):

- a. Identify all Persons, including Mitsubishi Electric Employees and Samsung SDI Employees, that participated in this meeting.
- b. Identify all Documents Related to this meeting.

- c. Identify all percipient witness statements or testimony Related to this meeting.
- d. Describe all actions and statements that occurred during this meeting, including by Identifying the information shared at this meeting.

RESPONSE TO INTERROGATORY NO. 17:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Target directs Defendants to Samsung SDI’s Supplemental Response to the DPPs’ Interrogatory No. 5. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 18:

For the alleged receipt of confidential production reports on June 17, 1998, May 16, 2001, and April 3, 2002 (alleged in ¶ 149, bullet 17):

- 1 a. Identify all Persons, including Mitsubishi Electric Employees, that sent or
- 2 received these confidential production reports.
- 3 b. Identify all Documents Related to these confidential production reports.
- 4 c. Identify all percipient witness statements or testimony Related to these
- 5 confidential production reports.
- 6 d. Describe all actions and statements that occurred during the exchange and receipt
- 7 of these confidential production reports.

8 **RESPONSE TO INTERROGATORY NO. 18:**

9 Target refers to and incorporates its General Objections as though set forth fully herein.

10 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.

11 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence

12 and “state its case” in responses to written discovery. Target further objects to this Interrogatory

13 on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and

14 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other

15 discovery propounded by other defendants in MDL No. 1917. Target further objects to this

16 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or

17 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks

18 information that is in Defendants’ possession, custody, or control, or equally available to

19 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have

20 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

21 Subject to and without waiving the foregoing objections, Target refers to and incorporates

22 its responses to Interrogatory No. 1. Target directs Defendants to Samsung SDI’s Supplemental

23 Response to the DPPs’ Interrogatory No. 5. Target also incorporates by reference the responses

24 of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect

25 Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar

26 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves

27 the right to supplement and/or amend its response to this Interrogatory as appropriate.

28

INTERROGATORY NO. 19:

Identify any meetings, communications, exchanges, agreements, or receipts of confidential information other than those specifically identified in ¶ 149 of the Complaint in which Mitsubishi Electric participated that Relate to a conspiracy for CRTs or CRT Products involving Mitsubishi Electric. For any meetings, communications, exchanges, agreements, or receipts of confidential information that you identify:

- a. Identify all Persons involved.
- b. Identify all Related Documents.
- c. Provide the date, time, and location.
- d. Identify all Related percipient witness statements or testimony.
- e. Describe all actions and statements that occurred.

RESPONSE TO INTERROGATORY NO. 19:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “related to,” and “describe” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to Defendants. Target also objects to this Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

Target further objects to this Interrogatory to the extent that it seeks, in contravention of well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No. 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 (“If

1 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not
 2 appropriate, still less is it appropriate in discovery”); *Continental Ore Co. v. Union Carbide &*
 3 *Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620
 4 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)),
 5 and improperly seeks “to carve the alleged conspiracy into a number of mini-conspiracies.” *In re*
 6 *TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07-1827 SI, 2011 WL 7724271, at *1-2 (N.D.
 7 Cal. Nov. 8, 2011).

8 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 9 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 10 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 11 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 12 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 13 the right to supplement and/or amend its response to this Interrogatory as appropriate.

14 **INTERROGATORY NO. 20:**

15 Other than the communications identified in ¶ 149 of the Complaint, Identify all “regular
 16 communications” that Samsung SDI Employees had with Mitsubishi Electric Employees
 17 regarding CRTs or CRT Products (as alleged in Complaint ¶ 137) by:

- 18 a. Identifying all Persons involved in these “regular communications.”
- 19 b. Identifying all Documents Related to these “regular communications.”
- 20 c. Providing the date, time, and location of each “regular communication.”
- 21 d. Identifying percipient witness statements or testimony Related to these “regular
 22 communications.”
- 23 e. Describing all actions and statements that occurred during these “regular
 24 communications.”

25 **RESPONSE TO INTERROGATORY NO. 20:**

26 Target refers to and incorporates its General Objections as though set forth fully herein.
 27 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 28 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence

1 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
 2 on the grounds that the terms “actions,” “related to,” and “describing” are vague, ambiguous, and
 3 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 4 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 5 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 6 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 7 information that is in Defendants’ possession, custody, or control, or equally available to
 8 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 9 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

10 Target further objects to this Interrogatory to the extent that it seeks, in contravention of
 11 well-established legal principles, to dismember the overall conspiracy to focus on its separate
 12 parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No.
 13 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 (“If
 14 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not
 15 appropriate, still less is it appropriate in discovery”); *Continental Ore Co. v. Union Carbide &*
 16 *Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620
 17 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)),
 18 and improperly seeks “to carve the alleged conspiracy into a number of mini-conspiracies.” *In re*
 19 *TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07–1827 SI, 2011 WL 7724271, at *1-2 (N.D.
 20 Cal. Nov. 8, 2011).

21 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 22 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 23 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 24 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 25 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 26 the right to supplement and/or amend its response to this Interrogatory as appropriate.

27 **INTERROGATORY NO. 21:**

28 Other than the meetings specifically identified in ¶ 149 of the Complaint, Identify

1 all “group meetings” regarding CRTs or CRT Products in which Mitsubishi Electric Employees
2 by:

- 3 a. Identifying all Persons involved in these “group meetings.”
- 4 b. Identifying all Documents Related to these “group meetings.”
- 5 c. Providing the date, time, and location of each “group meeting.”
- 6 d. Identifying percipient witness statements or testimony Related to these “group
7 meetings.”
- 8 e. Describing all actions and statements that occurred during these “group
9 meetings.”

10 **RESPONSE TO INTERROGATORY NO. 21:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
12 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
13 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
14 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
15 on the grounds that the terms “actions,” “related to,” and “describing” are vague, ambiguous, and
16 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
17 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
18 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
19 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
20 information that is in Defendants’ possession, custody, or control, or equally available to
21 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
22 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

23 Target further objects to this Interrogatory to the extent that it seeks, in contravention of
24 well-established legal principles, to dismember the overall conspiracy to focus on its separate
25 parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No.
26 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 (“If
27 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not
28

appropriate, still less is it appropriate in discovery”); *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)), and improperly seeks “to carve the alleged conspiracy into a number of mini-conspiracies.” *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07-1827 SI, 2011 WL 7724271, at *1-2 (N.D. Cal. Nov. 8, 2011).

Subject to and without waiving the foregoing objections, Target refers to and incorporates its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 22:

Identify all alleged “affirmative acts” (as alleged in Complaint ¶ 222) taken by Mitsubishi Electric Employees to conceal a conspiracy related to CRTs or CRT Products, by stating the name of the Mitsubishi Electric Person that took the “affirmative act,” the date, time, and place of such act, Identifying any Documents Related to such “affirmative acts,” and by Describing all actions and statements that occurred during the “affirmative acts,” including any actions to conceal a conspiracy.

RESPONSE TO INTERROGATORY NO. 22:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome. Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence and “state its case” in responses to written discovery. Target further objects to this Interrogatory on the grounds that the terms “actions,” “identify,” “related to,” and “describing” are vague, ambiguous, and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client

1 privilege or work-product doctrine. Target further objects to this Interrogatory to the extent it
 2 seeks information that is in Defendants' possession, custody, or control, or equally available to
 3 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 4 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

5 Target further objects to this Interrogatory to the extent that it seeks, in contravention of
 6 well-established legal principles, to dismember the overall conspiracy to focus on its separate
 7 parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No.
 8 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 ("If
 9 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not
 10 appropriate, still less is it appropriate in discovery"); *Continental Ore Co. v. Union Carbide &*
 11 *Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620
 12 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)),
 13 and improperly seeks "to carve the alleged conspiracy into a number of mini-conspiracies." *In re*
 14 *TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07-1827 SI, 2011 WL 7724271, at *1-2 (N.D.
 15 Cal. Nov. 8, 2011).

16 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 17 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 18 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 19 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 20 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 21 the right to supplement and/or amend its response to this Interrogatory as appropriate.

22 **INTERROGATORY NO. 23:**

23 Identify all alleged "pretextual reasons" (as alleged in Complaint ¶ 222) given by
 24 Mitsubishi Electric Employees for their pricing and output actions by stating the name of the
 25 Mitsubishi Electric Person that gave "pretextual reasons," the date, time and place of such
 26 provided reason, Identifying any Documents Related to such "pretextual reasons," and by
 27 Describing all actions and statements that occurred during the provision of the "pretextual
 28 reasons."

1 **RESPONSE TO INTERROGATORY NO. 23:**

2 Target refers to and incorporates its General Objections as though set forth fully herein.
 3 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 4 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 5 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
 6 on the grounds that the terms “actions,” “related to,” and “describing” are vague, ambiguous, and
 7 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 8 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 9 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 10 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 11 information that is in Defendants’ possession, custody, or control, or equally available to
 12 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 13 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

14 Target further objects to this Interrogatory to the extent that it seeks, in contravention of
 15 well-established legal principles, to dismember the overall conspiracy to focus on its separate
 16 parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No.
 17 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 (“If
 18 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not
 19 appropriate, still less is it appropriate in discovery”); *Continental Ore Co. v. Union Carbide &*
 20 *Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620
 21 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)),
 22 and improperly seeks “to carve the alleged conspiracy into a number of mini-conspiracies.” *In re*
 23 *TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07-1827 SI, 2011 WL 7724271, at *1-2 (N.D.
 24 Cal. Nov. 8, 2011).

25 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 26 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 27 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 28 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar

1 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 2 the right to supplement and/or amend its response to this Interrogatory as appropriate.

3 **INTERROGATORY NO. 24:**

4 Identify all agreements made by Mitsubishi Electric Employees and at least one other Co-
 5 conspirator “to give pretextual reasons for price increases and output reductions” (as alleged in
 6 Complaint ¶ 228), by stating the name of the Mitsubishi Electric Person that entered into such
 7 agreement, the date, time, and place of such agreement, Identifying any Documents Related to
 8 such agreement, and by Describing all actions and statements that occurred during the making of
 9 agreements “to give pretextual reasons for price increases and output reductions.”

10 **RESPONSE TO INTERROGATORY NO. 24:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
 12 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 13 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 14 and “state its case” in responses to written discovery. Target further objects to this Interrogatory
 15 on the grounds that the terms “actions,” “related to,” and “describing” are vague, ambiguous, and
 16 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
 17 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
 18 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
 19 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
 20 information that is in Defendants’ possession, custody, or control, or equally available to
 21 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
 22 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

23 Target further objects to this Interrogatory to the extent that it seeks, in contravention of
 24 well-established legal principles, to dismember the overall conspiracy to focus on its separate
 25 parts, instead of looking at it as a whole, *see In re CRT Antitrust Litigation*, Master Docket No.
 26 3:07-cv-05944sc, Recommended Order of the Special Master, dated August 15, 2014 (“If
 27 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not
 28 appropriate, still less is it appropriate in discovery”); *Continental Ore Co. v. Union Carbide &*

1 *Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620
 2 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)),
 3 and improperly seeks "to carve the alleged conspiracy into a number of mini-conspiracies." *In re*
 4 *TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07-1827 SI, 2011 WL 7724271, at *1-2 (N.D.
 5 Cal. Nov. 8, 2011).

6 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 7 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 8 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 9 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 10 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 11 the right to supplement and/or amend its response to this Interrogatory as appropriate.

12 **INTERROGATORY NO. 25:**

13 If you contend that Mitsubishi Electric did not effectively withdraw from the conspiracy
 14 alleged in the Complaint Related to Color Picture Tubes (or "CPTs") by 1998, state every basis or
 15 factual ground that supports such a contention, Identify each Document that You contend
 16 supports such a contention, Identify each percipient witness statement or testimony that You
 17 contend supports such a contention, Identify each Person who has knowledge concerning each
 18 contention, and Describe the actions or statements that You contend support such a contention.

19 **RESPONSE TO INTERROGATORY NO. 25:**

20 Target refers to and incorporates its General Objections as though set forth fully herein.
 21 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 22 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 23 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
 24 on the grounds that the phrase "factual ground" and the terms "knowledge," "actions," "identify,"
 25 "related to," and "describe" are vague, ambiguous, and overbroad. Target further objects to this
 26 Interrogatory to the extent that it is duplicative of other discovery propounded by other
 27 defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it
 28 seeks information protected by the attorney-client privilege or work-product doctrine. Target

1 further objects to this Interrogatory to the extent it seeks information that is in Defendants'
 2 possession, custody, or control, or equally available to Defendants. Target also objects to this
 3 Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R.
 4 Civ. P. 33(a)(1).

5 Subject to and without waiving the foregoing objections, Target refers to and incorporates
 6 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
 7 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
 8 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
 9 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
 10 the right to supplement and/or amend its response to this Interrogatory as appropriate.

11 **INTERROGATORY NO. 26:**

12 If you contend that Mitsubishi Electric did not effectively withdraw from the conspiracy
 13 alleged in the Complaint Related to Color Display Tubes (or "CDTs") by 2005, state every basis
 14 or factual ground that supports such a contention, Identify each Document that You contend
 15 supports such a contention, Identify each percipient witness statement or testimony that You
 16 contend supports such a contention, Identify each Person who has knowledge concerning each
 17 contention, and Describe the actions or statements that You contend support such a contention.

18 **RESPONSE TO INTERROGATORY NO. 26:**

19 Target refers to and incorporates its General Objections as though set forth fully herein.
 20 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
 21 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
 22 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
 23 on the grounds that the phrase "factual ground" and the terms "knowledge," "actions," "related
 24 to," and "describe" are vague, ambiguous, and overbroad. Target further objects to this
 25 Interrogatory to the extent that it is duplicative of other discovery propounded by other
 26 defendants in MDL No. 1917. Target further objects to this Interrogatory to the extent that it
 27 seeks information protected by the attorney-client privilege or work-product doctrine. Target
 28 further objects to this Interrogatory to the extent it seeks information that is in Defendants'

1 possession, custody, or control, or equally available to Defendants. Target also objects to this
2 Interrogatory on the grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R.
3 Civ. P. 33(a)(1).

4 Subject to and without waiving the foregoing objections, Target refers to and incorporates
5 its responses to Interrogatory No. 1. Target also incorporates by reference the responses of all
6 other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser
7 Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
8 interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target reserves
9 the right to supplement and/or amend its response to this Interrogatory as appropriate.

10 **INTERROGATORY NO. 27:**

11 Identify all Persons that you contend were owned or controlled by Mitsubishi Electric and
12 from whom You purchased CRTs or CRT Products, by stating the time periods during which You
13 purchased CRTs or CRT Products from such entities, Identifying any Documents Related to
14 Mitsubishi Electric's ownership and control of such entity upon which You base Your contention,
15 Identifying percipient witnesses statements or testimony Related to Mitsubishi Electric's
16 ownership and control of such entity, and Describing the actions or statements that You contend
17 support the contention that Mitsubishi Electric owned or controlled such entity.

18 **RESPONSE TO INTERROGATORY NO. 27:**

19 Target refers to and incorporates its General Objections as though set forth fully herein.
20 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
21 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
22 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
23 on the grounds that the terms "actions," "related to," and "describing" are vague, ambiguous, and
24 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
25 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
26 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
27 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
28 information that is in Defendants' possession, custody, or control, or equally available to

1 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
2 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

3 Subject to and without waiving the foregoing objections, Target refers to and incorporates
4 its responses to Interrogatory No. 1. Pursuant to Fed. R. Civ. P. 33(d), Target directs Defendants
5 to the transactional data it produced in this litigation. Target also incorporates by reference the
6 responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the
7 Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially
8 similar interrogatories propounded by all defendants in MDL. Discovery is ongoing and Target
9 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

10 **INTERROGATORY NO. 28:**

11 Identify all Persons Identified in Interrogatory No. 27 whose sales of CRTs or CRT
12 Products You or Your expert economist included in computing Your overcharge damages
13 allocated to Mitsubishi Electric and the time periods of such Person's sales included in computing
14 Your overcharge damages (as described in Exhibit 15 of the Report Of Alan S. Frankel, Ph.D.
15 dated April 15, 2014, provided by You).

16 **RESPONSE TO INTERROGATORY NO. 28:**

17 Target refers to and incorporates its General Objections as though set forth fully herein.
18 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
19 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
20 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
21 to the extent that it is duplicative of other discovery propounded by other defendants in MDL No.
22 1917. Target further objects to this Interrogatory to the extent that it seeks information protected
23 by the attorney-client privilege or work-product doctrine. Target further objects to this
24 Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or
25 control, or equally available to Defendants. Target also objects to this Interrogatory on the
26 grounds that Defendants have exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

27 Subject to and without waiving the foregoing objections, Target refers to and incorporates
28 its responses to Interrogatory No. 1. Pursuant to Fed. R. Civ. P. 33(d), Target directs Defendants

1 to the expert report of Dr. Frankel, the back-up material, and all files and data referred to in the
2 report and materials. Target also incorporates by reference the responses of all other plaintiffs in
3 this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all
4 other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by
5 all defendants in MDL. Discovery is ongoing and Target reserves the right to supplement and/or
6 amend its response to this Interrogatory as appropriate.

7 **INTERROGATORY NO. 29:**

8 Do You contend that sales by Mitsubishi Electric of CRTs or CRT Products that were
9 shipped by Mitsubishi Electric to a location outside of the United States are the subject of any
10 claim alleged in the Complaint? If so, please Identify the customers outside of the United States
11 to whom Mitsubishi Electric shipped CRTs or CRT Products that are subject to Your claim, the
12 time periods of such sales, the volume of such sales, and Describe the legal theory by which You
13 intend to include such sales in Your claim.

14 **RESPONSE TO INTERROGATORY NO. 29:**

15 Target refers to and incorporates its General Objections as though set forth fully herein.
16 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
17 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
18 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
19 on the grounds that terms "describe," "theory," "location" and "identify" are vague, ambiguous,
20 and overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of
21 other discovery propounded by other defendants in MDL No. 1917. Target further objects to this
22 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
23 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
24 information that is in Defendants' possession, custody, or control, or equally available to
25 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
26 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

27 Subject to and without waiving the foregoing objections, Target refers to and incorporates
28 its responses to Interrogatory No. 1. Target, pursuant to Fed. R. Civ. P. 33(d) refers Defendants

1 to its production of purchase order and point of sale data, which reflect the products that are the
2 subject of Target's claims.

3 **INTERROGATORY NO. 30:**

4 If You contend that Mitsubishi Electric is liable to you on any factual or legal theory not
5 specifically set forth in the Complaint, state each theory, Identify each Document that You
6 contend supports each theory, Identify each Person who has knowledge concerning each theory,
7 and Describe any actions or statements that You contend supports each theory.

8 **RESPONSE TO INTERROGATORY NO. 30:**

9 Target refers to and incorporates its General Objections as though set forth fully herein.
10 Target further objects on the grounds that this Interrogatory is overbroad and unduly burdensome.
11 Target also objects to this Interrogatory as improperly requiring Target to marshal all evidence
12 and "state its case" in responses to written discovery. Target further objects to this Interrogatory
13 on the grounds that terms "knowledge," "concerning," and "theory" are vague, ambiguous, and
14 overbroad. Target further objects to this Interrogatory to the extent that it is duplicative of other
15 discovery propounded by other defendants in MDL No. 1917. Target further objects to this
16 Interrogatory to the extent that it seeks information protected by the attorney-client privilege or
17 work-product doctrine. Target further objects to this Interrogatory to the extent it seeks
18 information that is in Defendants' possession, custody, or control, or equally available to
19 Defendants. Target also objects to this Interrogatory on the grounds that Defendants have
20 exceeded the 25-interrogatory limit of Fed. R. Civ. P. 33(a)(1).

21 Target reserves the right to supplement its response to this Interrogatory based on further
22 discovery investigation, expert work, or other developments in this case.

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8 DATED: August 25, 2014

By: /s/ Astor H.L. Heaven

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Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
August 25, 2014

DIRECT VENDOR	BASIS FOR STANDING	SUPPORT
Daewoo Electronics America, Inc.	Co-conspirator Orion Electric Co., Ltd. owned and controlled by the Daewoo Group (including Daewoo Electronics Corporation and Orion Electric Components, Co., Ltd.)	<p>Precht, Michael, et. al., The Korean Electronics Industry, CRC Press, (c) 1997, at 50-51, 91, available at: http://books.google.com/books?id=Mou8BCG158YC&pg=PA50&ots=0Fb2YQJ88&dq=orion%20electric%20daewoo%20closed&pg=PA50#v=snippet&q=orion%20electric&f=false</p> <p>Harvard Business School, "Daewoo's Globalization: Uz-Daewoo Auto Project", No. 9-598-065, March 23, 1998, at 19-21 of 35.</p> <p>Troubled Company Reporter, "ORION ELECTRIC: Creditor Opposition May Abort Sale" April 5, 2005, Vol. 8, No. 66, available at: http://bankrupt.com/TCRAP_Public/050405.mbx</p> <p>Amended Writ of Summons, <i>Curtis Sonders and Chunghwa Picture Tubes, Ltd., et. al.</i>, November 13, 2009, at 11-12 of 32, Case No. 5:097394 (BCSC), available at: http://www.cflawyers.ca/wp-content/uploads/2012/05/CRTClassAction_Writ.pdf</p> <p>Steinberg, David, Korea's Changing Roles in Southeast Asia: Expanding Influence and Relations, Institute of Southeast Asian Studies, (c) 2010 at 132, available at: http://books.google.com/books?id=PnVF8G9rCjc&pg=PA132&ots=IGjhSq1P8&dq=orion%20electric%20daewoo%20closed&pg=PA132#v=onepage&q&f=false</p>
Daewoo Electronics America, Inc.	Daewoo Electronics America, Inc. owned and controlled by Daewoo Electronics Corporation	<p>Article, "Daewoo and VMS Demonstrate the Latest in Wireless Home Entertainment Technology at CES," Jan. 8, 2004, available at: http://www.vms.com/pressreleasetail.php?e=112</p> <p>Appeal from the United States District Court for the Northern District of California in Case No. 04-CV-01830, <i>Funa Electric Company Ltd. v. Daewoo Electronics Corp. et. al.</i>, Sept. 1, 2010, available at: http://patentmy.com/media/docs/2010/09/09-1225-1244.pdf</p> <p>Article, "Federal Circuit finds Successor Company Liable for Infringement by Prior Company," September 6, 2010, available at: http://uniplaw.wordpress.com/2010/09/06/federal-circuit-finds-successor-company-liable-for-infringement-by-prior-company/</p> <p>Article, "Successor to U.S. subsidiary liable for predecessor's patent damages liability notwithstanding its establishment pursuant to foreign agreement between foreign companies," October 28, 2010, available at: http://www.lexology.com/library/detail.aspx?g=78c13e38-7c11-4288-a07d-0f56a794c95e</p> <p>Memorandum of Law, <i>John Roburn, et. al. v. Doe Woo, Inc. et. al.</i>, (N.D. Texas 2010), Case 3:09-cv-01172-G, Dkt. 21, available at: http://www.gpo.gov/idsys/plg/USCOURTS-tnd.3_09-cv-01172/pdf/USCOURTS-tnd.3_09-cv-01172-0.pdf</p> <p>Business Week, Company Overview of Daewoo Electronics America Inc., available at: http://investing.businessweek.com/research/stocks/private/snapshot.asp?privcapId=4236851</p> <p>Article, "NewsStar Business Credit Provides \$15MM to Daewoo Electronics America," October 29, 2013, available at: http://www.abladvisor.com/news/3399/newstar-business-credit-provides-15mm-to-daewoo-electronics-america</p>
Daewoo Electronics Corporation	Orion Electric Co., Ltd. owned and controlled by the Daewoo Group (including Daewoo Electronics Corporation and Orion Electric Components, Co., Ltd.)	See entry for Daewoo Electronics America, Inc. <i>infra</i>

Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
August 25, 2014

<p>Hitachi America Ltd. 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Heiser, In Re: Cathode Ray (CRT) Antitrust Litigation, July 3, 2012 at 30:4-6; 382:16-18</p> <p>Deposition of Yasuhiro Morishima, In Re: Cathode Ray (CRT) Antitrust Litigation, July 12, 2012 at 370:5-24</p> <p>Deposition of William Whalen, In Re: Cathode Ray (CRT) Antitrust Litigation, August 23, 2012 at 92:11-13</p> <p>Deposition of Modesto Rodriguez, In Re: Cathode Ray (CRT) Antitrust Litigation, August 23, 2012 at 26:23- 27:3</p> <p>Hitachi America, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission In Re: Cathode Ray (CRT) Antitrust Litigation, February 18, 2014, at No. 1</p> <p>Hitachi Electronic Devices (USA), Inc. Responses and Objections to DAP's 1st Set of Requests for Admission In Re: Cathode Ray (CRT) Antitrust Litigation, February 18, 2014, at No. 1</p> <p>Hitachi, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission In Re: Cathode Ray (CRT) Antitrust Litigation, February 18, 2014, at No. 1</p> <p>Defendant Hitachi Home Electronics (America) Inc.'s Statement Pursuant to Rule 7.1 Kentucky Bureau Mutual Insurance Company v. Hitachi Home Electronics (America), Inc., at 1, Case No.3:08-cv-00030-DCR-JBT, Dkt. No. 2 dated June 23, 2008 [E.D. Ky.]</p>
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Hitachi America Ltd. Computer
Division

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	2003&sa=X&ei=AQDNuK7uMtaHOOHQr_4DWcG&ved=OCGIOTgEWBW
	Hitachi Ltd. 20-F Annual Report, filed September 30, 2003, at 20, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312503056135/d30f.txt
	Hitachi Ltd. 20-F Annual Report, filed August 20, 2004, at 16, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312504144233/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed August 26, 2005, at 15, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312505174960/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed August 7, 2006, at 17, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312506163031/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed June 26, 2007, at 13, 21, 24, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312507142357/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed June 20, 2008, at 17 and 55, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312508137042/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed July 27, 2009, at 19, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312509155317/d20f.htm
	Hitachi Ltd. 20-F Annual Report, filed June 29, 2010, at 26, available at http://www.sec.gov/Archives/edgar/data/47710/0000119312510149406/d20f.htm
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	Hitachi Displays, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission, In Re: Carhode Roy (CRT) Antitrust Litigation, February 18, 2014, at No. 12
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Annual Report 2007, at 32, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2007.pdf</p> <p>Statement of Stephen D. Snoke, Executive Vice President and General Counsel for Hitachi High Technologies America, Inc., at 1, available at: http://www.irs.gov/pub/irs-apa/hitachi_high_technologies_america_-_stephen_snoke.pdf</p> <p>Irene Hersher, USITC, "Dynamic random access memory semiconductor of 256 kilobits and above from Japan", 1986, at A-9, available at: http://books.google.com/books?id=TDV0U8pChYC&pg=RA1-PA9&v=onepage&q=%22Nissel%20Sangyo%20America,%20Ltd.%22%20%20subsidiary&f=false</p> <p>Article, "Hitachi High Technologies America Formed to Address High-End Instrumentation Solutions Market", March 20, 2002, available at: http://www.hitachi-america.us/about/press/details/032002.html</p> <p>Deposition of Yasuhiro Morishima, In Re: Cathode Ray (CRT) Antitrust Litigation, July 12, 2012, at 68:20-70:3, 70:20-24</p> <p>Deposition of Nobuhito Kobayashi, In Re: Cathode Ray (CRT) Antitrust Litigation, July 17, 2012, at 88:15-20</p> <p>Hitachi, Ltd. Responses and Objections to DAP's 1st Set of Requests for Admission, In Re: Cathode Ray (CRT) Antitrust Litigation, February 18, 2014, at No. 5</p>	<p>Nissel Sangyo Co., Ltd. Annual Report 2000, at 42, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2000.pdf</p> <p>Nissel Sangyo Co., Ltd. Annual Report 2001, at 7, 38, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2001.pdf</p> <p>Nissel Sangyo Co., Ltd. Annual Report 2002, at 17, 22, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2002.pdf</p> <p>Nissel Sangyo Co., Ltd. Annual Report 2003, at 24, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2003.pdf</p> <p>Nissel Sangyo Co., Ltd. Annual Report 2004, at 44, 55, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2004.pdf</p> <p>Nissel Sangyo Co., Ltd. Annual Report 2005, at 24, 40, 61, available at: http://www.hitachi-hitec.com/global/fir/direpor/ar2005.pdf</p> <p>Nissel Sangyo Co., Ltd. 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Snoke, Executive Vice President and General Counsel for Hitachi High Technologies America, Inc., at 1, available at: http://www.irs.gov/pub/irs-apa/hitachi_high_technologies_america_-_stephen_snoke.pdf</p> <p>Hitachi Ltd. 20-F Annual Report, filed March 31, 2002, at 18 [ownership interest 73.4%], available at http://www.sec.gov/Archives/edgar/data/47710/000114549020020327/000264e20v1.txt</p> <p>Hitachi Ltd. 20-F Annual Report, filed September 30, 2003, at 9, 20 [ownership interest 67.6%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312503056135/d20f.txt</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 20, 2004, at 16, 96 [ownership interest 55.4%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312504144223/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 26, 2005, at 16 [ownership interest 55.3%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312505174960/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed August 7, 2006, at 17 [ownership interest 51.7%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312506163031/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 26, 2007 [ownership interest 51.7%], at 18, 25, available at http://www.sec.gov/Archives/edgar/data/47710/000119312507142357/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 20, 2008, at 13, 17, 23, 29, 30 [51.7%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312508137042/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed July 27, 2009, at 14, 19 [51.8%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312509155317/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 29, 2010, at 21, 26 [ownership interest 51.8%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312510149406/d20f.htm</p> <p>Hitachi Ltd. 20-F Annual Report, filed June 24, 2011, at 19, 24 [ownership interest 51.8%], available at http://www.sec.gov/Archives/edgar/data/47710/000119312511172867/d20f.htm</p> <p>Article, "Hitachi High Technologies America Formed to Address High-End Instrumentation Solutions Market", March 20, 2002, available at: http://www.hitachi-america.us/about/press/details/032002.html</p> <p>Hitachi Ltd. Annual Securities Report (FY 2012) at page 14 [Hitachi, Ltd.'s ownership interest 51.8%], available at http://www.hitachi.com/ir-e/library/stock/hit_sr_fy2012_a_en.pdf</p>	<p>Nissel Sangyo Co., Ltd. owned and controlled by Nissel Sangyo Co., Ltd. (N/A Hitachi High-Technologies Corporation)</p> <p>Nissel Sangyo Co., Ltd. (N/A Hitachi High-Technologies Corporation) owned and controlled by Defendant Hitachi, Ltd.</p>
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Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
August 25, 2014

LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 1998 Annual Report, at 31, 33 and 37-39, available at http://www.lge.co.kr/upload/RMR/Annual_report_1998[0].pdf
	LG Electronics Inc. 1999 Annual Report, at 35, 40, 44, 47, available at: http://www.lg.com/global/pdf/annual-report-1999.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 1999 Audit Report, at 21, 34, 45, available at: http://www.lg.com/global/pdf/audit-report-1999.pdf
	LG Electronics Inc. 2000 Annual Report, at 58, 65, 72, 77, available at: http://www.lg.com/global/pdf/annual-report-2000.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2000 Audit Report, at 24, 38, 52, available at: http://www.lg.com/global/pdf/audit-report-2000.pdf
	LG Electronics Inc. 2001 Annual Report, at 8, 63, 74, available at: http://www.lg.com/global/pdf/annual-report-2001.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2001 Audit Report, at 24, 37, 53, available at: http://www.lg.com/global/pdf/audit-report-2001.pdf
	LG Electronics Inc. 2002 Annual Report, at 24, 29, 30, 37, 46, available at: http://www.lg.com/global/pdf/annual-report-2002.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2002 Audit Report, at 73, 77-80, 89, 99, available at: http://www.lg.com/global/pdf/audit-report-2002.pdf
	LG Electronics Inc. 2003 Annual Report, at 25, 30-33, 42, 52, available at: http://www.lg.com/global/pdf/annual-report-2003.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2003 Audit Report, at 25, 30-33, 42, 52, available at: http://www.lg.com/global/pdf/audit-report-2003.pdf
	LG Electronics Inc. 2004 Annual Report, at 84, 88-91, 101, 108, 127, available at: http://www.lg.com/global/pdf/annual-report-2004.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2004 Audit Report, at 27, 32-35, 45, 53, available at: http://www.lg.com/global/pdf/audit-report-2004.pdf
	LG Electronics Inc. 2005 Audit Report, at 28, 33-35, 37, 48, 59, available at: http://www.lg.com/global/pdf/annual-report-2005.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2006 Annual Report, at 60, available at: http://www.lg.com/global/pdf/annual-report-2006.pdf
	LG Electronics Inc. 2006 Consolidated Financial Statements, at 3, 14, 17, 46 of 64, available at: http://www.lg.com/global/pdf/financial-statements-2006.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Press Release. LG Electronics USA Names K.I. Kwon To President of the Consumer Electronics Division. July 26, 2006, http://www.lg.com/us/press-release/lg-electronics-usa-names-ki-kwon-to-president-of-the-consumer-electronics-division
	LG Electronics Inc. 2007 Consolidated Financial Statements, at 15, 17, 27, 46-47, available at: http://www.lg.com/global/pdf/financial-statements-2007.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2008 Annual Report, at 39, available at: http://www.lg.com/global/pdf/annual-report-2008.pdf
	LG Electronics Inc. 2008 Consolidated Financial Statements, at 14, 16, 40, available at: http://www.lg.com/global/pdf/LGE_2008consolidated.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2009 Consolidated Financial Statements, at 15-16, 40, available at: http://www.lg.com/global/pdf/LGE_2009_English-report-(Consolidated).pdf
	LG Electronics Inc. 2010 Separate Interim Financial Statements, at 37, 61, 64, available at: http://www.lg.com/global/pdf/LGE-2010-4Q-Consolidation.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2011 Separate Interim Financial Statements, at 38, 60, 64, available at: http://www.lg.com/global/pdf/%5B2011%5DConsolidated-Interim-Financial-Statements.pdf
	LG Electronics Inc. 2012 3Q Separate Interim Financial Statements, at 16, 31, 35, available at: http://www.lg.com/global/pdf/2012_3Q_LG_Interim_Separate_Financial_Statement.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. Separate Financial Statements 2012 at 39, available at http://www.lg.com/global/investor-relations/reports/financial-statements
	LG Electronics Inc. 2013 Consolidated Financial Statements at 18, available at http://www.lg.com/global/investor-relations/reports/financial-statements
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	Zenith Electronics Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 In Zenith Electronics Corp. v. V. Inc., Westinghouse Digital Electronics LLC, 5:08-cv-00246-Df, Dkt. 2, October 30 2006 (E.D. Texas)
	Deposition of Yun Seok Lee, In Re: Cathode Ray (CRT) Antitrust Litigation, July 11, 2012 at 22:23-23:7
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2001 Audit Report, at 3, 31, 24, 58, available at: http://www.lg.com/global/pdf/audit-report-2001.pdf
	LG Electronics Inc. 2001 Annual Report, at 45, 53, 64, 90, available at: http://www.lg.com/global/pdf/annual-report-2001.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	LG Electronics Inc. 2002 Audit Report, at 25, 31, available at: http://www.lg.com/global/pdf/audit-report-2002.pdf
	LG Electronics Inc. 2002 Annual Report, at 34, available at: http://www.lg.com/global/pdf/annual-report-2002.pdf
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	Joint Venture Agreement by and between LG Electronics, Inc. and Koninklijke Philips Electronics N.V., June 11, 2001 (LGE0000054-16.1), at 26-27.
	Deposition of Mok Hyeon Seong, In Re: Cathode Ray (CRT) Antitrust Litigation, July 9, 2012 at 55:3-17: 61:10-14
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	Deposition of Thomas Heiser, In Re: Cathode Ray (CRT) Antitrust Litigation, March 18, 2014 at 159:5-13
	Deposition of Kyung Tae Kwon, In Re: Cathode Ray (CRT) Antitrust Litigation, July 13, 2012 at 40:4-9
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	Deposition of Jim Smith, In Re: Cathode Ray (CRT) Antitrust Litigation, December 12, 2013 at 74:11-15; 207:14-18; 263:5-11, 366:23-367:7
	Deposition of Duk Chul Ryu, In Re: Cathode Ray (CRT) Antitrust Litigation, January 15, 2014 at 51:12-22
LG Electronics U.S.A., Inc. owned and controlled by Defendant LG Electronics, Inc. (f/k/a GoldStar Co. Ltd.)	Deposition of Patrick Canavan, In Re: Cathode Ray (CRT) Antitrust Litigation, January 30, 2014 at 50:14-21

LG Electronics U.S.A., Inc.

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Defendant LG Philips Displays International Ltd. owned and controlled by LG Philips Displays Holding B.V. (n/k/a LP Displays)	Information on Legal Entities of LG Philips Displays, no date (PHLP-CRT-095919-25) at PHLP-CRT-095924
	Information on Legal Entities of LG Philips Displays, dated 1/24/2002 (PHLP-CRT-095919-925) at 924
	Information on Legal Entities of LG Philips Displays, dated 8/1/2002 (LPD-NL00093612-616) at 615
	Information on Legal Entities of LG Philips Displays, dated 7/4/2003 (LPD-NL00202015-2022) at 2020
Defendant LG Philips Displays Holding B.V. (n/k/a LP Displays) owned and controlled by LG Electronics Wales Ltd.	Information on Legal Entities of LG Philips Displays, dated 12/31/2003 (LPD-NL00174797-805) at 802
	Information on Legal Entities of LG Philips Displays, dated 9/15/2005 (PENAC-DOJ-0000565-574) at 571
	LG Electronics Inc. 2003 Audit Report, at 4, 26-27, 36, available at: http://www.lg.com/global/pdf/annual-report-2003.pdf
	LG Electronics Inc. 2004 Audit Report, at 50, 74, 81, available at: http://www.lg.com/global/pdf/annual-report-2004.pdf
LG Electronics Wales Ltd. owned and controlled by Defendant LG Electronics, Inc.	LG Electronics Inc. 2005 Audit Report, at 58, 92, available at: http://www.lg.com/global/pdf/annual-report-2005.pdf
	LG Electronics Inc. 2006 Consolidated Financial Statements, at 15, available at: http://www.lg.com/global/pdf/financial-statements-2006.pdf
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	LG Electronics Inc. 2008 Consolidated Financial Statements, at 13, available at: http://www.lg.com/global/pdf/con-audit-report-1999.pdf
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<p>Zenith Electronics Corporation (a/k/a Zenith Electronics LLC) owned and controlled by LG Electronics U.S.A., Inc.</p>	<p>Zenith Electronics Corporation (a/k/a Zenith Electronics LLC) owned and controlled by LG Electronics U.S.A., Inc.</p>	

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<p>Mitsubishi Digital Electronics America, Inc. (n/v/a Mitsubishi Electric Visual Solutions America, Inc.)</p>	<p>Mitsubishi Digital Electronics America, Inc. (n/v/a Mitsubishi Electric Visual Solutions America, Inc.) owned and controlled by Mitsubishi Electric US Holdings, Inc.</p>	<p>2003 communication from Mitsubishi Electric Corporation to the Federal Communications Commission in FCC Proceeding 02-230, Oct. 30, 2003, available at: http://efcdocs.fcc.gov/filings/2003/10/31/551040554.html Mitsubishi's Certificate of Interested Persons and Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>John P. Graney v. Mitsubishi Digital Electronics America, Inc.</i>, Case No. 8:05-cv-01206-ALC-KRS, Dkt. No. 12, dated Sept. 26, 2005 [M.D. FL] Defendant Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1 in <i>Orbisk, LLC v. The DirectTV Group, Inc. et al</i>, Case No. 2:05-cv-00519-TJW, Dkt. No. 93, dated Mar. 17, 2006 [E.D. Tex.] Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1 <i>Positive Technologies v. BenQ America Corp., et al</i>, Case No. 2:07-cv-00067-MHS, Dkt. No. 31, dated May 1, 2007 [E.D. Tex.] Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1 <i>Genoa Color Technologies v. Mitsubishi et al</i>, Case No. 1:07-cv-06233-PKC, Dkt. No. 15, dated Sept. 5, 2007 [S.D.N.Y.] Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1 <i>Cheetah Omni LLC v. Samsung Electronics America, Inc., and Mitsubishi Digital Electronics America, Inc.</i>, Case No. 6:08-cv-00279-LED, Dkt. No. 20, dated Sept. 2, 2008 [E.D. Tex.] Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1, <i>Aratatech Japan Corporation v. Chi Mei Optoelectronics et al</i>, Case No. 5:08-cv-00137-TJW, Dkt. No. 65, dated Nov. 10, 2008 [E.D. Tex.] Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1 <i>ICM, LLC, d/b/a Intellectual Capital Holdings Limited v. LG Electronics et al</i>, Case No. 5:08-cv-00177-DF-CMC, Dkt. No. 20, dated Dec. 8, 2008 [E.D. Tex.] Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronics USA, Inc., Mitsubishi Electric Visual Solutions America, Inc., and Mitsubishi Digital Electronics America, Inc. Statement Pursuant to Rule 7.1, <i>Rovi Corporation et al v. Mitsubishi Electric Corp. et al</i>, Case No. 1:12-cv-00547-SLR, Dkt. No. 10, dated June 7, 2012 [D. Del.] Mitsubishi Digital Electronics America, Inc.'s Corporate Disclosure Statement Pursuant to Rule 7.1 <i>Ingénio Color Technologies v. Mitsubishi et al</i>, Case No. 1:07-cv-06233-PKC, Dkt. No. 15, dated Sept. 5, 2007 [S.D.N.Y.]</p>
<p>Mitsubishi Consumer Electronics America, Inc.</p>	<p>Mitsubishi Consumer Electronics America, Inc. owned and controlled by Defendant Mitsubishi Electric Corp.</p>	<p>Article, "Mitsubishi Plans Television Research Center : Electronics: The \$11-million facility, scheduled to open in October, will employ more than 100 people in the county", February 7, 1995, available at: http://articles.latimes.com/1995-02-07/business/fi-29248_1_research-center Article, "Mitsubishi restructures electronics operations", October 29, 1998, available at: http://www.etimes.com/document.asp?doc_id=1119504 Article, "COMPANY NEWS; MITSUBISHI TO REORGANIZE ITS UNITED STATES OPERATIONS", October 30, 1998, available at: http://www.nytimes.com/1998/10/30/business/company-news-mitsubishi-to-reorganize-its-united-states-operations.html</p>
<p>Mitsubishi Electronics America, Inc.</p>	<p>Mitsubishi Electronics America, Inc. owned and controlled by Defendant Mitsubishi Electric Corp.</p>	<p>Article, "Mitsubishi Electric to Restructure", Oct. 30, 1998, available at: http://articles.latimes.com/1998/oct/30/business/fi-37566 Book, "Certain Dynamic Random Access Memories and Components Thereof", Inv. 337-TA-242, November 1987, at 5, available at: http://books.google.com/books?id=iJ8s3XBwa7YC&pg=PA8-IA9&ots=IBL_PjEY&dq=%22Mitsubishi%20Electronics%20America%20inc.%22&pg=PA8-IA9&onepage&q=%22Mitsubishi%20Electronics%20America%20inc.%22&f=false Order Denying Plaintiff's Motion for Partial Summary Judgment of an Established Royalty Rate as the Reasonable Royalty for the Simm Patents <i>Wang Laboratories, Inc. v. Mitsubishi Electronics America, Inc.</i>, 860 F.Supp. 1448 [C.D. California 1993], available at: http://www.leagle.com/decision/19937308860FSupp1448_12122 Article, "Mitsubishi Merges 2 U.S. Subsidiaries : Reorganization: Its consumer electronics group in Cypress and high-tech marketing group in Torrance will be combined in a single Cypress-based entity", July 17, 1990, available at: http://articles.latimes.com/1990-07-17/business/fi-391_1_consumer-electronics-group Article, "Mitsubishi Unit Named in Complaint : Electronics: The action by the U.S. International Trade Commission could lead to a ban on the import and sale of the company's semiconductors", August 28, 1993, available at: http://articles.latimes.com/1993-08-28/business/fi-37120_1_national-semiconductor Article, "BLACK AND WHITE CIF IMAGE SENSOR M64287U", 1999, available at: http://www.ic72.com/pdf_file/m/118868.pdf Article, "Mitsubishi Electronics America's Real Time Visualization makes European debut at ECR 2000", March 5, 2000, available at: http://www.terarecon.com/wordpress/press-release/mitsubishi-electronics-americas-real-time-visualization-makes-european-debut-at-ecr-2000 Article, "M16C/62 PRODUCT OVERVIEW", 1997, available at: http://icwic.com/icwic/data/pdf/cdf/cd006/228318.pdf Article, "Mitsubishi restructures electronics operations", October 30, 1998, available at: http://www.etimes.com/document.asp?doc_id=1119493</p>

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	NEC Solutions (America), Inc. owned and controlled by NEC USA, Inc.	<p>Article, "NEC USA, NEC America & NEC Solutions (America) to be Combined to Form NEC Corporation of America", Apr. 26, 2006, http://www.nec.co.jp/press/en/0604/2602.html</p> <p>NEC America, Inc., NEC Display Solutions of America, Inc., NEC Solutions (America), Inc., and NEC Unified Solutions, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in Technology Properties Limited, Inc. v. Fujitsu Limited et al., Case No. 2:05-cv-00494-TJW, Dkt. No. 34 (dated Jan. 11, 2006) [E.D. Tex.]</p>
	NEC USA, Inc. wholly owned and controlled by NEC Corp.	<p>NEC America, Inc., NEC Display Solutions of America, Inc., NEC Solutions (America), Inc., and NEC Unified Solutions, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in Technology Properties Limited, Inc. v. Fujitsu Limited et al., Case No. 2:05-cv-00494-TJW, Dkt. No. 34 (dated Jan. 11, 2006) [E.D. Tex.]</p> <p>Disclosure Statement of NEC Corporation, NEC Electronics America, Inc., NEC Corporation of America, NEC Display Solutions of America, Inc., NEC Financial Services, Inc., NEC USA, and NEC America in Orion IP, LLC v. Yokohama Tire Corp., et al. Case No. 6:06-cv-00364-LED, Dkt. No. 89 (dated Nov. 10, 2006) [E.D. Tex.]</p> <p>NEC, Chart of Consolidated Subsidiaries, September 30, 2001, available at: http://www.nec.co.jp/press/en/0110/images/2603-03.pdf</p> <p>Article, "NEC USA, NEC America & NEC Solutions (America) to be Combined to Form NEC Corporation of America", Apr. 26, 2006, http://www.nec.co.jp/press/en/0604/2602.html</p> <p>Article, "NEC USA Promotes Gerald Kenney to Senior Vice President and General Counsel, Kenney to Oversee All Legal Operations at NEC USA Companies", April 6, 2004, available at: http://www.businesswire.com/news/home/20040406005449/en/NEC-USA-Promotes-Gerald-Kenney-Senior-Vice-President</p>
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<p>Joint venture NEC Display Solutions, Ltd. (J/V) a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.</p>	<p>NEC Corp. 20-F Annual Report dated Sept. 28, 2000 at 5, http://www.sec.gov/Archives/edgar/data/772127/000095012300008913/000152e20-f.txt</p> <p>Article, "NEC & Mitsubishi Electric Establish Display Monitor Businesses", Jan. 28, 2000, available at http://www.nec.co.jp/press/en/0001/2801.html</p> <p>NEC Corp. 20-F Annual Report dated Sept. 21, 2001 at F-15, http://www.sec.gov/Archives/edgar/data/772127/000114554901500046/000188e20-f.txt</p> <p>NEC Corp. 20-F Annual Report dated Aug. 6, 2002 at F-15, http://www.sec.gov/Archives/edgar/data/772127/000114554902000196/000250e20v1.txt</p> <p>NEC Corp. 20-F Annual Report dated Sept. 1, 2003 at F-15, http://www.sec.gov/Archives/edgar/data/772127/000114554903001173/000497e20v1.txt</p> <p>NEC Corp. 20-F Annual Report dated Sept. 17, 2004 at F-16, http://www.sec.gov/Archives/edgar/data/772127/000095012304011077/000743e20v1.htm</p> <p>Article, "NEC-MITSUBISHI Begins Operations as NEC Display Solutions", Apr. 1, 2005, available at: http://www.necdisplay.com/press-release/nec-mitsubishi-begins-operations-as-nec-display-so/413</p> <p>Regulation (EEC) No. 4064/89 Merger Procedure, Case No. COMP/M.1883-NEC/MITSUBISHI, dated Mar. 4, 2000, available at: http://ec.europa.eu/competition/mergers/cases/decisions/m1883_en.pdf</p> <p>NEC Corporation Responses and Objections to Direct Action Plaintiffs' First Set of Requests for Admission, April 11, 2013, <i>In Re TFT-LCD (Flat Panel) Antitrust Litigation</i>, MDL No. 1827, at Nos. 1, 30</p> <p>Joint Venture Agreement, NEC Corporation and Mitsubishi Electric Corporation, December 27, 1999, NNV Articles of Incorporation of NEC-Mitsubishi Electric Visual Systems Corporation, December 27, 1999</p> <p>NEC Corporation Responses and Objections to Direct Action Plaintiffs' First Set of Requests for Admission, April 11, 2013, <i>In Re TFT-LCD (Flat Panel) Antitrust Litigation</i>, MDL No. 1827, at Nos. 11</p>
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	<p>Article, "EXECUTIVE CHANGES", August 23, 1990, available at: http://www.nytimes.com/1990/08/23/business/executive-changes-931790.html</p> <p>Article, "NEC Technologies Inc. Recalls PC 17-01 And PC 17-02 Laptop Computer Batteries", November 22, 1994, available at: http://www.cpsc.gov/en/Recalls/1994/NEC-Technologies-Inc-Recalls-PC-17-01-And-PC-17-02-Laptop-Computer-Batteries/</p> <p>NEC Corporate Directory, March 31, 1996, available at: http://www.nec.com/en/global/jr/library/annual/1996/corpo/corpo.html</p> <p>Decision, at Paragraph 3, in <i>NEC Home Electronics, Ltd. and NEC Technologies, Inc. v. The United States and Zenith Electronics Corporation</i>, 54 F.3d 736 (Fed. Cir. 1995), available at: http://law.justia.com/cases/federal/appellate-courts/F3/54/736/483076/</p> <p>NEC Corp. 20-F Annual Report dated Sept. 28, 2000 at F. 14, available at: http://www.sec.gov/Archives/edgar/data/72127/000095012300008913/000152e20-f.txt</p>	<p>Article, "NEC Technologies Ships New Generation of MT10 Series Full Featured Portable Projectors: Superior Choice for Conference Room and Classroom Use", October 2, 2000, available at: http://www.projectorcentral.com/news_story_252.htm</p> <p>Article, "NEC Technologies Shines on Rental/Selling Market with Brightest Projector in The Nighthawk Line to Date", April 19, 2001, available at: http://www.projectorcentral.com/news_story_291.htm</p> <p>NEC Chart of Consolidated Subsidiaries, September 30, 2001, available at: http://www.nec.co.jp/press/en/0110/images/2603-03.pdf</p> <p>Article, "NEC Technologies Introduces Merlin - A Unique Video 'Wizard' That Makes Using A Ready Computer Easy and Fun: Merlin Video Wizard, Multimedia Direct Links, Hand-Held Remote Control and Other Friendly Features Highlight Upcoming Ready Line of Multimedia PCs", February 19, 2006, available at: http://www.thefreelibrary.com/NEC+Technologies+introduces+Merlin+--+A+Unique+Video+Wizard%22+Tha...+a018011108</p> <p>Company Overview of NEC Technologies, Inc., available at: http://investing.businessweek.com/research/stocks/private/snapshot.asp?privcapid=929364</p>	<p>Customs Ruling, HQ 228255, March 18, 1999, available at: http://rulings.cbp.gov/detail.asp?ru=228255&ac=pr</p> <p>Article, "NEC Systems Debuts Its New Internet Business Solutions Division", August 1, 2000, available at: http://winningmessage.com/NECSystemsNewInternetBus%20release.htm</p> <p>Article, "NEC Systems Readies Services For Midsize Companies", July 31, 2000, available at: http://business.highbeam.com/137376/article-1G1-63802582/nec-systems-readies-services-midsize-companies-new</p> <p>NEC Chart of Consolidated Subsidiaries, September 30, 2001, available at: http://www.nec.co.jp/press/en/0110/images/2603-03.pdf</p> <p>Article, "Packard Bell assets sold to contract manufacturer", December 13, 1999, available at: http://www.bizjournals.com/sacramento/stories/1999/12/13/daily1.html</p>	<p>Article, "V-ONE and NEC Computers Inc. 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First to introduce Transmeta-based Ultraportable Enterprise Notebook Computers in North America", April 16, 2001, available at: http://www.pcstats.com/articleview.cfm?articleID=640</p> <p>Article, "NEC Computers Inc. Unveils Sleek New Ultraportable Notebook Computer for Executive Computing Needs", May 7, 2001, available at: http://www.emalwrite.com/release/NEC-Computers-Inc-Unveils-Sleek-New-Ultraportable-Notebook-Computer-for-Executive-Computing-Needs.html</p>	<p>Article, "NEC Computers Inc. Ships New Version of 'All-in-One' Space-Saving PC", September 11, 2001, available at: http://nec-client.shareholder.com/releaseDetail.cfm?h_print=yes&released=58296</p> <p>Article, "NVIDIA's GeForce2 MX Selected for NEC Computers International's Mainstream Personal Computers", June 28, 2000, available at: http://www.nvidia.com/object/IO_20010711_4551.html</p> <p>NEC Chart of Consolidated Subsidiaries, September 30, 2001, available at: http://www.nec.co.jp/press/en/0110/images/2603-03.pdf</p> <p>NEC Corp. 20-F Annual Report dated Sept. 21, 2001 at F. 15, available at: http://www.sec.gov/Archives/edgar/data/72127/000114554901500046/000188e20-f.txt</p>	<p>NEC Corp. 20-F Annual Report dated Aug. 6, 2002 at F. 15, http://www.sec.gov/Archives/edgar/data/72127/000114554902000196/000250e20-f.txt</p> <p>NEC Corp. 20-F Annual Report dated Sept. 1, 2003 at F. 15, available at: http://www.sec.gov/Archives/edgar/data/72127/0001145549030001173/000497e20-f.txt</p> <p>NEC Corp. 20-F Annual Report dated Sept. 17, 2004 at F. 16, available at: http://www.sec.gov/Archives/edgar/data/72127/000095012304011077/000743e20-f.htm</p> <p>NEC Corp. 20-F Annual Report dated Sept. 25, 2005 at "Organizational Structure", available at: http://www.sec.gov/Archives/edgar/data/72127/000114554905001703/001003e20-f.htm</p>
NEC Technologies Inc.	NEC Technologies, Inc. owned and controlled by NEC Corp.		NEC Systems, Inc. owned and controlled by NEC Corp.	NEC Computers Inc. owned and controlled by NEC Computers International B.V.	NEC Technologies Inc.	NEC Computers International B.V. owned and controlled by NEC Corp.

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	<p>Company Overview of NEC Technologies, Inc., available at: http://investing.businessweek.com/research/stocks/private/snapshot.asp?privcapId=929364</p> <p>Article, "NEC merges two units with headquarters in Sacramento", February 14, 2002, available at: http://www.bizjournals.com/sacramento/stories/2002/02/13/daily37.html</p> <p>Article, "NEC Technologies Achieves Accurate Color Reproduction and True Film Look With Latest TriDigital Series Projector", March 4, 2002, available at: http://www.primewire.com/news-releases/nec-technologies-achieves-accurate-color-reproduction-and-true-film-look-with-latest-tridigital-series-projector-76247417.html</p> <p>Article, "NEC Technologies, Visual Systems Introduces New Website", March 12, 2002, available at: http://presentationmaster.digitalmedianet.com/article/NEC-Technologies-Visual-Systems-Introduces-New-Website-8611</p> <p>Article, "NEC unveils high-performance chip", April 29, 2002, available at: http://www.bizjournals.com/sacramento/stories/2002/04/29/daily42.html</p> <p>Article, "NEC Solutions America Gets CEO", June 16, 2003, available at: http://www.lightreading.com/nec-solutions-america-gets-cso/d/d-id/592604</p> <p>NEC Corp. 20-F Annual Report dated Sept. 1, 2003 at F-15, available at: http://www.sec.gov/Archives/edgar/data/772127/000114554903001173/100497e20vf.txt</p> <p>NEC Corp. 20-F Annual Report dated Sept. 17, 2004 at F-16, available at: http://www.sec.gov/Archives/edgar/data/772127/000095012304011077/100743e20vf.htm</p> <p>NEC Corp. 20-F Annual Report dated Sept. 25, 2005 at "Organizational Structure", available at: http://www.sec.gov/Archives/edgar/data/772127/000114554905001703/101003e20vf.htm</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p>
<p>NEC Technologies, Inc., NEC Systems, Inc., and NEC Computers Inc. merged to form NEC Solutions (America), Inc.</p> <p>NEC Solutions (America), Inc. owned and controlled by NEC USA, Inc.</p> <p>NEC USA, Inc. owned and controlled by NEC Corp.</p> <p>NEC USA, Inc., NEC America, Inc., and NEC Solutions (America), Inc. merged to form NEC Corporation of America</p> <p>NEC Corporation of America wholly owned and controlled by NEC Corp.</p> <p>Joint venture NEC Display Solutions, Ltd. (f/k/a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.</p>	

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<p>NEC Display Solutions of America, Inc. (I/A NEC-Mitsubishi Electronics Display of America)</p>	<p>NEC Display Solutions of America, Inc. owned and controlled by joint venture NEC Display Solutions Ltd. (I/A NEC-Mitsubishi Electric Visual Systems Corp.)</p>	<p>Article, "NEC-MITSUBISHI Begins Operations as NEC Display Solutions", Apr. 1, 2005, available at: http://www.necdisplay.com/press-release/nec-mitsubishi-begins-operations-as-nec-display-so/413</p> <p>PR Newswire, "NEC-Mitsubishi Electronics Display of America, Inc. Appoints T.J. Trojan As President and Chief Operating Officer", dated Oct. 1, available at: http://www.prnewswire.com/news-releases/nec-mitsubishi-electronics-display-of-america-inc.-appoints-tj-trojan-as-president-and-chief-operating-officer-72319722.html</p> <p>Article, "NEC-Mitsubishi Electric Visual Systems Corporation to become NEC Corporation wholly-owned subsidiary", Feb. 23, 2005, available at: http://www.nec-display-solutions.com/p/se/sv/news/db/Internet/Content/PressReleases/2005/Company/NMElectronicVisualCorporation/NMElectronicVisualCorporation.html?cat=8&year=2005</p> <p>NEC Display Solutions of America, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Positive Technologies v. BenQ America Corp. et al.</i>, Case No. 2:07-cv-00067-MHS, Dkt. No. 12 (dated Apr. 23, 2007) (E.D. Tex.)</p> <p>NEC America, Inc., NEC Display Solutions of America, Inc., and NEC Unified Solutions, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Technology Properties Limited, Inc. v. Fujitsu Limited et al.</i>, Case No. 2:05-cv-00494-TW, Dkt. No. 34 (dated Jan. 11, 2006) (E.D. Tex.)</p> <p>Plaintiff's Statement Pursuant to Rule 7.1 in <i>NEC Display Solutions of America, Inc. v. M-Tek Kiosk, Inc.</i>, Case No. 3:11-cv-00070-HZ, Dkt. No. 3 (dated Jan. 19, 2011) (D. Or.)</p> <p>Article, "NEC-Mitsubishi's New MultiSync(R) LCD2110 Leads Flat Panel Monitor Industry", August 24, 2000, available at: http://www.prnewswire.com/news-releases/nec-mitsubishi-new-multisync-led2110-leads-flat-panel-monitor-industry-73009697.html</p> <p>Article, "NEC-Mitsubishi Electronics Display of America, Inc. Appoints T.J. Trojan As President and Chief Operating Officer; Leadership to Focus Company on Growth in New Display Applications for Customers, Businesses and Specialty Markets", October 1, 2003, available at: http://www.prnewswire.com/news-releases/nec-mitsubishi-electronics-display-of-america-inc.-appoints-tj-trojan-as-president-and-chief-operating-officer-72319722.html</p> <p>See entry for NEC Corporation of America, <i>infra</i>.</p>
	<p>Joint venture NEC Display Solutions Ltd. (I/A NEC-Mitsubishi Electric Visual Systems Corp.) owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.</p>	

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Packard Bell NEC, Inc. (P/N/a PB Electronics)	Packard Bell NEC, Inc. owned and controlled by NEC Corp. Joint venture NEC Display Solutions, Ltd. (I/N/a NEC-Mitsubishi Electric Visual Systems Corp.) jointly owned and controlled by Defendant Mitsubishi Electric Corp. and NEC Corp.	See NEC Press Release (Japanese) 7/31/1998, available at http://www.nec.co.jp/press/ja/9807/3101.htm . NEC Corp.'s 2000 20-F filing (filed March 31, 2000 at F-16), available at http://www.sec.gov/Archives/edgar/data/72127/000095012300008913/000152e20-f.txt . NEC Corp.'s 2001 20-F filing (filed September 21, 2001), available at http://www.sec.gov/Archives/edgar/data/72127/000114554901500046/000188e20-f.txt . See entry for NEC Corporation of America, infra.
Panasonic Consumer Electronics Co. is an unincorporated division of Defendant Panasonic Corporation of North America (I/N/a Matsushita Electric Corporation of America)		See Hughes v. Panasonic Consumer Electronics Co., 2011 WL 2976839 at *1 (D.N.J. 2011). See Memorandum of Law in Support of Defendant's Motion to Dismiss the First Amended Complaint in Hughes v. Panasonic Consumer Electronics Co., at 4, April 27, 2010, (E.D. N.J.), Case No. 2:10-cv-00946-SDW-MCA, Dkt. 9. Article, "Panasonic picks a former BestBuy.com executive to head consumer sales", July 29, 2013, available at: http://www.internetretailer.com/2013/07/29/panasonic-hires-former-bestbuycom-executive Panasonic/Technics Audio Products Limited Warranty, at 1, available at: http://www2.panasonic.com/static/Warranty/WARRANTY_HomeAudio.pdf Deposition of Masahiro Kimura, In Re: Cathode Ray (CRT) Antitrust Litigation, July 19, 2012 at 34:8-35:3 Panasonic North America Company Profile, http://www.panasonic.com/about/overview.asp Fortino v. Quasar Co., a Division of Matsushita Electric Corporation of America, 950 F.2d 389, 391 (7th Cir. 1993) Clark v. Matsushita Electric Industrial Co., Ltd., et al., 811 F.Supp. 1061, 1064, 1068 (M.D. Pa 1993) Article, "Matsushita's North American Operations To Form New Management Team", February 13, 1997, available at: http://www.thefreeibrary.com/Matsushita%27s+North+American+Operations+To+Form+New+Management+Team-a019123132 Environmental Sustainability Report 1999, at 74, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Environmental Sustainability Report 2001, at 44-46, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Environmental Sustainability Report 2002, at 13, 71-72, available at http://panasonic.net/sustainability/en/downloads/back_number/index.html Panasonic Corporation 20-F Annual Report, filed September 10, 2003, at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312503047505/d20f.htm Article, Matsushita Announces Proposed Senior Management Changes, April 28, 2004, at 4 of 4, http://panasonic.net/ir/relevant/en040428-4/en040428-4-1.pdf (last visited 1/3/13). Panasonic Corp. 20-F Annual Report at 18, filed 2001-7-31 Panasonic Corp. 20-F Annual Report at 25, filed 2002-7-22 Panasonic Corp. 20-F Annual Report at 29, filed 2003-9-10 Panasonic Corporation 20-F Annual Report, filed September 13, 2004, at 30, available at http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm Panasonic Corporation 20-F Annual Report, filed September 12, 2005, at 33, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm Panasonic Corporation 20-F Annual Report, filed September 11, 2006, at 34, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm Panasonic Corporation 20-F Annual Report, filed August 30, 2007 at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507197290/d20f.htm The Panasonic Report for Sustainability 2007, at 7-8, 32-33, 35, 38, 40 of 45, available at http://www.corporateregister.com/ja/10723/me07-csr-jp.pdf Panasonic Corporation 20-F Annual Report, filed June 30, 2008, at 36, available at http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 22, available at http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2010, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312510150553/d20f.htm Panasonic Corporation 20-F Annual Report filed June 30, 2011, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312511178201/d20f.htm Panasonic Corporation 20-F Annual Report filed June 28, 2012, at 24, available at http://www.sec.gov/Archives/edgar/data/63271/000119312512286456/d230958d20f.htm . Deposition of Masahiro Kimura, In Re: Cathode Ray (CRT) Antitrust Litigation, July 19, 2012 at 66:3-67:4
Panasonic Consumer Electronics Co.		

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	<p>Business integration Contract between Matsushita Electric Industrial Co., Ltd. and Toshiba Corporation, January 29, 2003, available at: 158-CRT-00018162</p> <p>Panasonic Corporation 20-F Annual Report filed September 13, 2004, at 12, 22, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 12, 2005, at 12, 126, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 11, 2006, at 11, 17, 127, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed August 30, 2007, at 11, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2008, at 14, available at http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 9, available at http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm</p> <p>Toshiba Corp. Annual Report 2003, at 35, 46, available at http://www.toshiba.co.jp/about/en/finance/ar/ar2003/ar2003e.pdf</p> <p>Toshiba Corp. Annual Report 2004, at 20, 43, 55, 74, available at http://www.toshiba.co.jp/about/en/finance/ar/ar2004/ar2004e.pdf</p> <p>Toshiba Corp. Annual Report 2005, at 40, 52, 67, available at http://www.toshiba.co.jp/about/en/finance/ar/ar2005/ar2005e.pdf</p> <p>Toshiba Corp. Annual Report 2006, at 43, 56, 70, available at http://www.toshiba.co.jp/about/en/finance/ar/ar2006/ar2006e.pdf</p> <p>Article, "Closure of MT Picture Display (M) Sdn. Bhd.", July 26, 2006, available at: https://www.toshiba.co.jp/about/en/news/20060726.htm</p> <p>Article, "Matsushita, Toshiba Advances CRT Joint Venture", March 28, 2003, available at: http://www.twlcc.com/news/matsushita-toshiba-advances-crt-joint-venture-2</p> <p>Notice on European Commission's Decision Concerning the Business of Color Picture Tubes, December 6, 2012, available at: http://www.toshiba.co.jp/about/en/news/20121206.pdf</p> <p>Deposition of Takashi Nakano, In Re: Cathode Ray (CRT) Antitrust Litigation, July 13, 2012, at 33:9-37:11; 42:23-43:10</p> <p>Deposition of Takao Tobinaga, In Re: Cathode Ray (CRT) Antitrust Litigation, July 16, 2012, at 18:12-19:2; 21:1-4; 115:20-22</p> <p>Deposition of Ayumu Kinoshita, In Re: Cathode Ray (CRT) Antitrust Litigation, February 5, 2013, at 36:4-7</p> <p>Deposition of Hun Sul Chu, In Re: Cathode Ray (CRT) Antitrust Litigation, February 11, 2014, at 20:1-2; 126:6-12</p> <p>MTPD-0193810, MTPD-0591715-21; MTPD-0599440-5; PC-0021795-805; PC-0021855-65; PC-0021962-6; PC-0022238-40; PC-0022345-50; PC-0022362-63; PC-0022370-71; PC-0022477-79; PC-0022526-32; PC-0022670-3; PC-0022682-5; PC-0022731-2; PC-0022810-2; PC-0022975-94; PC-0023088-108; PC-0023109-18; PC-0023213-4; PC-0023223-33; PC-0023279-301; PC-0023417-8; PC-0023520-21; PC-0023525-9; PC-0023563-7</p>
<p>Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America)</p>	<p>Defendant Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America) owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (In/k/a MT Picture Display Co., Ltd.)</p> <p>See entry for Panasonic Consumer Electronics Co., <i>infra</i></p> <p>Defendant Panasonic Corporation of North America (f/k/a Matsushita Electric Corporation of America) owned and controlled joint venture Defendant Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)</p> <p>Defendant Panasonic Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (In/k/a MT Picture Display Co., Ltd.)</p> <p>See entry for Panasonic Consumer Electronics Co., <i>infra</i></p>

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JVC Americas Corp. owned and controlled by Victor Company of Japan, Ltd. (in/k/a JVC Kenwood Corporation)	Victor Company of Japan Limited. Annual Report 1998, at 31 and 35 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1998-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 1999, at 31, and 35 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1999-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 2000, at 36, 39, of 40, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2000-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 2001, at 45 of 46, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2001-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 2002, at 45 and 48 of 50, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2002-e_all.pdf
	Article. "JVC Announces 3 New Dualmode Digital Cameras: The New GC-A33, GC-A50, AND GC-A55," March 2, 2003, available at: http://www.dviews.com/press/JVC_GC-A55.htm
	JVC Victor Company of Japan Limited. Annual Report 2003, at 55 of 56, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2003-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 2004, at 55, 56, and 58 of 59, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2004-e_all.pdf
	Victor Company of Japan, Ltd.'s Disclosure Statement Pursuant to Rule 7.1, <i>Clair Intellectual Property Consultants, Inc. v. Samsung, et al</i> , Case 1:04-cv-01436-LPS, C.A. No. 04-1436-LJF, April 20, 2005 (D. Delaware), available at https://ecfded.uscourts.gov/doc/0431315571
	JVC Victor Company of Japan, Limited. Annual Report 2005, at 57, and 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2005-e_all.pdf
	JVC Americas Corporation's Disclosure Statement Pursuant to Rule 7.1, <i>Compression Labs, Inc. v. Agfo Corp., et al</i> , Case 2:04-cv-00158-DF, Dkt. 73, July 28, 2004 (E.D. Texas), available at: http://docs.justia.com/cases/federal/district-courts/texas/txedce/2:2004cv00158/8470973/0.pdf?1188618381
	JVC Americas Corporation's Disclosure Statement Pursuant to Rule 7.1, <i>Orbiter, LLC v. The DirecTV Group, Inc., et al</i> , Case 2:05-cv-00519-TJW, Dkt. 76, March 17, 2006 (E.D. Texas)
	JVC Victor Company of Japan, Limited. Annual Report 2006, at 35, and 63 of 64, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2006-e_all.pdf
	JVC Victor Company of Japan, Limited. Annual Report 2007, at 22, 27, and 57 of 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2007-e_all.pdf
	JVC America. Company Overview, available at: http://www.jvc.com/company/index.jsp

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JVC Americas Corporation	<p>Article. "Matsushita Will Help Restructure JVC, May 31, 1994, available at: http://www.telecompaper.com/news/matsushita-will-help-restructure-jvc-27379</p> <p>Victor Company of Japan Limited. Annual Report 1998, at 25 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1998-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 1999, at 25 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar1999-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2000, at 28 of 40, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2000-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2001, at 5, 6 and 34 of 48, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2001-e_all.pdf</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2002, at 35 of 50, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2002-e_all.pdf</p> <p>JVC Victor Company of Japan Limited. Annual Report 2003, at 45 of 56, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2003-e_all.pdf</p> <p>Panasonic Corp. 20-F Annual Report, filed September 10, 2003, at 49, available at http://www.sec.gov/Archives/edgar/data/63271/000119312503047505/d20f.htm</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2004, at 32 and 47 of 61, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2004-e_all.pdf</p> <p>Panasonic Corporation. 20-F Annual Report, filed September 13, 2004, at 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2005, at 34, and 48 of 62, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2005-e_all.pdf</p> <p>Panasonic Corporation. 20-F Annual Report, filed September 12, 2005, at 32, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2006, at 30 and 51 of 64, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2006-e_all.pdf</p> <p>Panasonic Corporation. 20-F Annual Report, filed September 11, 2006, at 33, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2007, at 44 of 60, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar2007-e_all.pdf</p> <p>Panasonic Corporation. 20-F Annual Report, filed August 30, 2007, at 12, 29, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm</p> <p>JVC Victor Company of Japan, Limited. Annual Report 2008, at 18 of 36, available at http://www.jvckenwood.co.jp/en/ir/library/annual/data_jvc/ar_2008-en_fs_jvc.pdf</p> <p>Funding Universe. Victor Company of Japan, Limited History, available at: http://www.fundinguniverse.com/company-histories/victor-company-of-japan-limited-history/</p> <p>JVC Americas Corp. Disclosure Pursuant to Rule 7.1, International Control Systems, LLC v. Sony Electronics, Inc., et al., Case 2:08-cv-00188-CE, December 22, 2008, (E.D. Texas Marshall Div.)</p> <p>Press Release 7/24/2007 Notice on Capital and Business Alliance and Management Integration for Further Study, Between JVC and Kenwood as well as Third Party Allotment of New Shares of JVC, available at http://panasonic.co.jp/corp/news/official_data/data_dir/en070724-8/en070724-8.html</p>
	<p>Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation) owned and controlled by Defendant Panasonic Corporation (n/k/a Matsushita Electric Industrial Co., Ltd.)</p>

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JVC Company of America	JVC Company of America owned and controlled by JVC Americas Corp.	<p>Opinion, <i>JVC Co. of America, Div. of U.S. JVC Corp. v. U.S.</i>, 62 F. Supp. 2d 1132 (1999), Slip Op. 99-76 Court No. 99-09-00643, available at: http://www.leagle.com/decision/1999119462Fsupp2d1132_11092</p> <p>Opinion, <i>JVC COMPANY OF AMERICA DIVISION OF US JVC CORPORATION v. UNITED STATES</i>, No. 00-1028, November 21, 2000, available at: http://caselaw.findlaw.com/us-federal-circuit/1493518.html</p> <p>Article, "People on the Move: JVC Company of America Names CEO", October 2008, available at: http://www.dealerscope.com/article/people-move-jvc-company-america-names-ceo-176020/1</p> <p>HiFiEngine.com Owners Manuals, Service Manuals, Schematics, "JVC", available at: http://www.hifengine.com/library/jvc.shtml</p> <p>Barcodeinc.com, "JVC Surveillance Camera and Surveillance DVR", available at: http://www.barcodeinc.com/jvc/</p> <p>Article, "JVC introduces Portable High Definition Digital Player/Recorder", available at: http://www.creativeplanetnetwork.com/dcp/news/jvc-introduces-portable-high-definition-digital-playerrecorder/39551</p> <p>Article, "JVC's New Aineo XA-HD500 Portable MP3 Player", October 18, 2005, available at: http://www.ecoustics.com/products/jvc-new-aieo-xa-hd500-portable/</p> <p>Article, "JVC TH-L1 5.1 Surround System for Gamers and Home Theater, Too", June 27, 2007, available at: http://gizmodo.com/272744/jvc-th-l1-51-surround-system-for-gamers-and-home-theater-too</p> <p>JVC HD70H97 HD-ILA Television Brochure, at 2, available at: http://www.batterviewing.com/pdf/hd70h97.pdf</p> <p>See entry for JVC Americas Corp., <i>infra</i>.</p> <p>See entry for JVC Americas Corp., <i>infra</i>.</p>
JVC Company of America	JVC Americas Corp. owned and controlled by Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation)	
	Victor Company of Japan, Ltd. (n/k/a JVC Kenwood Corporation) owned and controlled by co-conspirator Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)	
Sanyo North America Corp.	Sanyo North America Corp. owned and controlled by Sanyo Electric Co., Ltd.	<p>Article, "Sanyo Projectors Benefit the Classroom and Lecture Hall with Innovative New Products", June 29, 2010, available at: http://www.hdtvmagazine.com/news/2010/09/sanyo-projectors-benefit-the-classroom-and-lecture-hall-with-innovative-new-products.php</p> <p>Article, "SANYO North America Corp. Announces New Distribution Arrangement for Consumer Batteries", April 6, 2010, available at: http://www.thefreeibrary.com/SANYO+North+America+Corp.+Announces+New+Distribution+Arrangement+for+...a0233200957</p> <p>Article, "SANYO Opens Plant in Oregon", November 2, 2009, available at: http://www.industryweek.com/companies-samp-executives/sanyo-opens-plant-oregon</p> <p>Article, "Sanyo's 'eneloop bike' runs on batteries and foot power", April 2010, available at: http://www.sandiegometro.com/2010/04/sanyos-eneloop-bike-runs-on-batteries-and-foot-power/</p> <p>Article, "Panasonic To Buy Sanyo", December 24, 2008, available at: https://www.sustainablebusiness.com/index.cfm/go/news.display?id/17373</p> <p>Panasonic Headquarter News 2008-12-19 (Amend) Panasonic and Sanyo Agree to Capital and Business Alliance, available at: http://panasonic.co.jp/corp/news/official_data/data_dir/en081219-7.html</p> <p>Panasonic Press Release 2009-11-4 Panasonic Announces Commencement of Tender Offer for SANYO Shares, available at: http://panasonic.co.jp/corp/news/official_data/data_dir/en091104-5/en091104-5-1.pdf</p> <p>Panasonic Press Release 2009-11-25 Panasonic Announces the Extension of the Period of the Tender Offer for SANYO Shares and Other Related Matters, available at: http://panasonic.co.jp/corp/news/official_data/data_dir/en091125-5/en091125-5-1.pdf</p> <p>Panasonic Headquarters News 2009-12-21 Sanyo Becomes a Panasonic Company, available at: http://panasonic.co.jp/corp/news/official_data/data_dir/en091221-2.html</p> <p>Panasonic Corp. 20-F Annual Report, filed March 31, 2011, at 2, 11-12, 17-18, 28, 34-35, 37-38, 111, 155, available at: http://www.sec.gov/Archives/edgar/data/63271/00011931251178201420f.htm</p> <p>Panasonic Corp. 20-F Annual Report, filed March 31, 2012, at 2, 13, 18, 23, 29, 39, 41, 116, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312512286456/d230958d20f.htm</p>

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Philips Consumer Electronics Co. is a subdivision of the Philips Group and is operated as a business division of Defendant Philips Electronics North America Corporation ("PENAC")	<p>Defendant Philips Consumer Electronics, Inc. Disclosure Pursuant to Rule 7.1, <i>Belfijo Feliz v. Philips Consumer Electronics, Inc., et al.</i>, Case No. 1:08-cv-07729-DC, Dkt. No. 12, October 3, 2008</p> <p>Article, "Company Information" Koninklijke Philips Electronics N.V., available at: http://topics.nytimes.com/top/news/business/companies/koninklijke_royal_philips_electronics_nv/article.html, "Royal Philips Electronics \$3.5 Billion Notes Offering", March 12, 2012, available at: http://www.davispolk.com/Royal-Philips-Electronics-15-Billion-Notes-Offering-03-12-2012/</p> <p>Royal Philips 20-F Annual Report dated Feb. 25, 2013, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000119312513073920/d486581dex8.htm</p> <p>Royal Philips and PENAC Resp. to Dell 1st RFP dated August 30, 2013, "Response to Request No. 1," at 12, Dell Inc., Dell Products L.P., v. PENAC, 3:07-md-5944-SC, (N.D. Cal.)</p> <p>Defendant Philips Consumer Electronics, Inc. Disclosure Pursuant to FRCP 7.1, <i>Belfijo Feliz v. Philips Consumer Electronics, Inc., et al.</i>, Case No. 1:08-cv-07729-DC, Dkt. No. 12, October 3, 2008</p> <p>Royal Philips 5-B dated May 26, 2005, "Statement of Changes in Beneficial Ownership" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000089183604000211/xslf345X02/scd101-04_ex.xml</p> <p>Royal Philips SC 130/A dated June 7, 2004, "Information to be Included in Statements Filed Pursuant to Rule 13d-1(a) and Amendments Thereto Filed Pursuant to Rule 13d-2(a)", http://www.sec.gov/Archives/edgar/data/313216/000089183604000224/scd105.txt</p> <p>2006-2-13 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>2005-2-22 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>2004-2-23 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>2003-3-14 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>2002-5-2 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>2001-5-7 Royal Philips 20-F Annual Report, Exhibit 8 "List of significant subsidiaries"</p> <p>Royal Philips SC 130/A dated June 7, 2004, "Information to be Included in Statements Filed Pursuant to Rule 13d-1(a) and Amendments Thereto Filed Pursuant to Rule 13d-2(a)", at 5, http://www.sec.gov/Archives/edgar/data/313216/000089183604000224/scd105.txt</p> <p>Royal Philips 5-B dated May 26, 2005, "Statement of Changes in Beneficial Ownership" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000089183604000211/xslf345X02/scd101-04_ex.xml</p> <p>Royal Philips 20-F Annual Report dated Feb. 20, 2007, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000115697307000251/us1902erv8.htm</p> <p>Royal Philips 20-F Annual Report dated Feb. 19, 2008, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000115697308000201/us4864erv8.htm</p> <p>Royal Philips 20-F Annual Report dated Feb. 23, 2009, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000115697309000099/006127erv8.htm</p> <p>Royal Philips 20-F Annual Report dated 2010-2-22, Exhibit 8, "List of subsidiaries" (no page number)</p> <p>Royal Philips 20-F Annual Report dated Feb. 18, 2011, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000095012311015455/u10449erv8.htm</p> <p>Royal Philips 20-F Annual Report dated 2012-2-24 Exhibit 8 "List of subsidiaries" (no page number)</p> <p>Royal Philips 20-F Annual Report dated Feb. 25, 2013, Exhibit 8, "List of Significant Subsidiaries" (no page number), http://www.sec.gov/Archives/edgar/data/313216/000119312513073920/d486581dex8.htm</p> <p>Royal Philips 20-F Annual Report dated 2014-2-25, Exhibit 8, "List of Significant Subsidiaries" (no page number)</p> <p>Article, "Philips to Acquire Genlyte, November 26, 2007", available at: http://www.hadco.com/Hadco/Public/Content.aspx?hashkey=Philips</p> <p>Royal Philips and PENAC Resp. to Dell 1st RFP dated August 30, 2013, "Response to Request No. 1," at 12, Dell Inc., Dell Products L.P., v. PENAC, 3:07-md-5944-SC, (N.D. Cal.)</p>
Philips Holding USA Inc. owned and controlled by Defendant Koninklijke Philips Electronics N.V.	<p>Philips Consumer Electronics Co.</p>

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	Joint Venture Agreement by and between LG Electronics, Inc. and Koninklijke Philips Electronics N.V. June 11, 2001 [PHLP-CRT-144478-144583], at 15-16	
	Philips Annual Report 2001, at 19, 55-56, available at: http://www.philips.com/shared/assets/DownloadableFile/FinancialStatements_AR01-1324.pdf	
	Royal Philips 20-F Annual Report dated May 2, 2002, at 14, 31, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697302000178/u44950e20-f.txt	
	Philips Annual Report 2002, at 23, 61, available at: http://www.philips.com/shared/assets/DownloadableFile/AR02-FinancialReport_2243.pdf	
	Royal Philips 20-F Annual Report dated March 14, 2003, at 15, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697303000371/u45959e20-f.txt	
	Philips Annual Report 2003, at 70, available at: http://www.philips.com/shared/assets/DownloadableFile/FinancialStatements_AR03-2812.pdf	
	Royal Philips 20-F Annual Report dated February 23, 2004, at 10, 32, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697304000207/u47131e20-f.htm	
	Royal Philips 20-F Amended Annual Report dated April 28, 2005, Exhibit 15(g), at 7, available at: http://www.sec.gov/Archives/edgar/data/313216/000115697305000564/u48648e20-f.htm	
	Philips Annual Review 2004, at 56, available at: http://www.philips.com/shared/assets/DownloadableFile/Philips_AnnualReview2004_2-13731.pdf	
	Philips Annual Report 2004, at 40, 128, 150, available at: http://www.philips.com/shared/assets/DownloadableFile/Philips_AnnualReport2004_2-13833.pdf	
	Philips Annual Report 2005, at 50, 119, 150, 174, 198, 209, available at: http://www.philips.com/shared/assets/DownloadableFile/AR_2005%283%29-15245.pdf	
	Philips Annual Report 2006 at 144, available at: www.philips.com/shared/assets/DownloadableFile/Investor/annual-report/Philips2006_AnnualReport.pdf	
	Deposition of Mok Hyeon Seong, In Re: Cathode Ray [CRT] Antitrust Litigation, July 9, 2012 at 55:3-17; 61:30-14	
	Deposition of Thomas Heiser, In Re: Cathode Ray [CRT] Antitrust Litigation, March 18, 2012 at 159:5-13	
	Deposition of Kyung Tae Kwon, In Re: Cathode Ray [CRT] Antitrust Litigation, July 13, 2012 at 40:4-9	
	Deposition of Jim Smith, In Re: Cathode Ray [CRT] Antitrust Litigation, December 12, 2012 at 74:11-15; 207:14-18; 263:5-11; 366:23-367:7	
	Deposition of Duk Chul Ryu, In Re: Cathode Ray [CRT] Antitrust Litigation, January 15, 2014 at 51:12-22	
	Deposition of Patrick Canavan, In Re: Cathode Ray [CRT] Antitrust Litigation, January 30, 2014 at 50:14-21	
	PHLP-CRT-001202-44; PHLP-CRT-002055-76; PHLP-CRT-002305-2481; PHLP-CRT-003077-215; PHLP-CRT-049348-50; PHLP-CRT-136698-744; PHLP-CRT-138683-95; LGED00091924; 36 LPD-NL00126762-64; LPD-NL00128880-3; LPD-NL00201824-9; BMCC-CRT000006565-6	
	See entry for LG Electronics USA, Inc., <i>infra</i> .	
Defendant LG Philips Displays Holding B.V. (n/k/a LP Displays)		
Defendant LG Philips Displays Holding B.V. (n/k/a LP Displays)		
Philips Electronics North America Corporation ("PENAC")	Defendant PENAC owned and controlled by Philips Holding USA Inc.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Philips Holding USA, Inc. owned and controlled by Defendant Koninklijke Philips Electronics N.V.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Joint venture LG Philips Displays Holding B.V. owned and controlled by Defendant Koninklijke Philips Electronics N.V.	See entry for Philips Consumer Electronics Co., <i>infra</i> .
	Defendant LG Philips Displays Holding B.V. (n/k/a LP Displays)	See entry for LG Electronics USA, Inc., <i>infra</i> .

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	Samsung 1999 Annual Report at 56, 81 of 83, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_1999.html
	Samsung 2000 Annual Report at 62, 85 of 88 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2000.html
	Samsung Electronics Co. Ltd.'s Audit Report 2001 dated March 13, 2002 at 23 of 48, available at http://www.sec.gov/Archives/edgar/vprr/02/9999999997-02-022823
	Samsung Electronics Co. Ltd.'s Audit Report 2002 dated May 6, 2003 at 22, 26, 31, 32, 56 of 62, available at http://www.sec.gov/Archives/edgar/vprr/03/9999999997-03-020649
	Samsung Electronics Co. Ltd.'s Audit Report 2004 dated May 4, 2005 at 27, 31 of 63, available at http://www.sec.gov/Archives/edgar/vprr/05/9999999997-05-022445
	Samsung Electronics Co. Ltd.'s Audit Report 2005 dated May 1, 2006 at 31, 36, 44, 65 of 73, available at http://www.sec.gov/Archives/edgar/vprr/06/9999999997-06-017635
	Samsung 2005 Annual Report at 87, 146 of 148 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2005.html
	Samsung 2006 Annual Report at 85, 152 of 154 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2006.html
	Samsung Electronics Co. Ltd.'s Audit Report 2006 dated April 4, 2007 at 29, 331, 39, 41, 63, 66 of 77, available at http://www.sec.gov/Archives/edgar/vprr/07/9999999997-07-016335
	Samsung 2007 Annual Report at 80, 84, 138 of 140 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2007.html
	Samsung Electronics Co. Ltd.'s Audit Report 2007 dated April 4, 2007 at 18, 22, 80-81, 84 of 95 (96-196 is duplicate), available at http://www.sec.gov/Archives/edgar/vprr/08/9999999997-08-022661
	Samsung 2008 Annual Report at 42, 61, 64, 104 of 106 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2008.html
	Samsung Electronics Co. Ltd.'s Audit Report 2008 dated March 30 at 30-37, 56, 61 of 69, available at http://www.sec.gov/Archives/edgar/vprr/09/9999999997-09-013805
	Samsung Electronics Co., Ltd. Annual Report 2009 at 49, available at http://japan.samsung.com/aboutsamsung/electronics/electronics/images/2009.pdf
	Samsung Electronics Co., Ltd. Annual Report 2010, available at http://www.samsung.com/us/aboutsamsung/hr/financialinformation/annualreport/downloads/2010/SECAR2010_Eng_Final.pdf
	Samsung Electronics Co., Ltd. Annual Report 2011 at 40, available at http://www.samsung.com/us/aboutsamsung/jr/financialinformation/annualreport/downloads/2011/SECAR2011_Eng_Final.pdf
	Samsung Electronics Co., Ltd. Annual Report 2012 at 28, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/downloads/2013/SECAR2012_Eng_Final.pdf
	Deposition of Steve Panosian, In Re: Cathode Ray (CRT) Antitrust Litigation, July 17, 2012 at 26:19-27:8
	Expert Report of Stephen Haggard (dated April 15, 2014) and all documents referred to therein
Samsung Electronics America, Inc.	

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	Samsung Electronics Co., Ltd. 1999 Annual Report at 70 of 83, available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_1999.html
	Samsung Electronics Co., Ltd. 2000 Annual Report at 63, 74 of 88 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2000.html
	Samsung Electronics Co., Ltd.'s Audit Report 2001 dated March 13, 2002 at 25, 42 of 48, available at http://www.sec.gov/Archives/edgar/vprr/D02/9999999997-02-022823
	Samsung Electronics Co., Ltd.'s Audit Report 2002 dated May 6, 2003 at 30-32, 56 of 62, available at http://www.sec.gov/Archives/edgar/vprr/D03/9999999997-03-020649
	Samsung Electronics Co., Ltd.'s Audit Report 2004 dated May 4, 2005 at 42, 44, 46, 65 of 72, available at http://www.sec.gov/Archives/edgar/vprr/D05/9999999997-05-022445
	Samsung Electronics Co., Ltd.'s Audit Report 2005 dated May 1, 2006 at 30, 35, 39, 41-45, 64 of 73, available at http://www.sec.gov/Archives/edgar/vprr/D06/9999999997-06-017635
	Samsung Electronics Co., Ltd. 2005 Annual Report at 104-106, 108, 127 of 148 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2005.html
	Samsung Electronics Co., Ltd.'s Audit Report 2006 dated April 4, 2007 at 28, 32, 37, 39-43, 67-68 of 77, available at http://www.sec.gov/Archives/edgar/vprr/D07/9999999997-07-016335
	Samsung Electronics Co., Ltd. 2006 Annual Report at 89, 102-106, 126-128 of 154 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2006.html
	Samsung Electronics Co., Ltd. 2007 Annual Report at 98-102, 125-126 of 140 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2007.html
	Samsung Electronics Co., Ltd.'s Audit Report 2007 dated April 4, 2007 at 44-45, 47-50, 82 of 95 (96-196 is duplicate), available at http://www.sec.gov/Archives/edgar/vprr/D08/9999999997-08-022661
	Samsung Electronics Co., Ltd.'s Audit Report 2008 dated March 30 at 30-33, 35-36, 60, 62 of 69, available at http://www.sec.gov/Archives/edgar/vprr/D09/9999999997-09-013805
	Samsung Electronics Co., Ltd. 2008 Annual Report at 76-77, 94-95 of 106 available at http://www.samsung.com/us/aboutsamsung/investor_relations/financial_information/annual_reports_2008.html
	Samsung SDI - Shareholders and Investors, available at: http://www.samsungsdi.com/sustain/f2_2.jsp
	Expert Report of Stephen Haggard (dated April 15, 2014) and all documents referred to therein.
Defendant Samsung SDI Co., Ltd. owned and controlled by Samsung Electronics Co. Ltd..	

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Thomson Consumer Electronics Inc. (n/a Technicolor USA Inc.)	Thomson Consumer Electronics Inc. owned and controlled by Technicolor SA (l/a Thomson SA)	<p>Thomson Group 20-F Annual Report, filed May 30, 2003, at 105, F.33, F-70, available at: http://www.sec.gov/Archives/edgar/data/1080259/000095016803002013/20f.htm</p> <p>Thomson Group 20-F Annual Report, filed June 29, 2004, at F.75, available at: http://www.sec.gov/Archives/edgar/data/1080259/000119312504111361/20f.htm</p> <p>Thomson Group 20-F Annual Report, filed June 3, 2005, at F-84, available at: http://www.sec.gov/Archives/edgar/data/1080259/000000000005/000000000005/20f.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed December 22, 2005, at F-84, available at: http://www.sec.gov/Archives/edgar/data/1080259/000117099705000054/m20f.htm</p> <p>Thomson Group 20-F Annual Report, filed May 12, 2006, at F.143, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817906000089/thomson.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed June 21, 2006, at F-143, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817906000106/thomson20fa.htm</p> <p>Thomson Group 20-F Annual Report, filed May 11, 2007, at F-91, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817907000089/tho00620f06.htm</p> <p>Thomson Group 20-F Amended Annual Report, filed July 24, 2007, at F-91, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817907000119/tho00620f06-complet.htm</p> <p>Thomson Group 20-F Annual Report, filed April 21, 2008, at 147, 275, available at: http://www.sec.gov/Archives/edgar/data/1080259/000130817908000046/thomson20f.htm</p> <p>Thomson 2008 20-F at 151, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor 2010-4-6 20-F at 128, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor Annual Report 2010 at 134, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor Annual Report 2011 at 128, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Technicolor, Annual Report 2012, at 137, 133, 219, 234, 242, 258, available at: http://interactivedocument.librador-company.com/Librador/EN/Technicolor/AnnualReport2012/?Page=244</p> <p>Technicolor Annual Report 2013 at 152, available at http://www.technicolor.com/en/who-we-are/investor-center</p> <p>Environmental Response and Revitalization Site Summary, RCA Corporation, March 2014, available at: http://www.epa.ohio.gov/cdo/rca.aspx</p> <p>Mergent Industrial, Technicolor SA, January 28, 2014, at 2, available at: http://www.mergent.com/docs/loans_new-companies/technicolor-sa-1-28-2014.pdf?shvsn=0</p> <p>U.S. Congress, Making things better: competing in manufacturing, DIANE Publishing, Copyright 1990, at 87-88, available at: http://books.google.com/books?id=sfpd4YX0HCE&pg=PA87&ots=SbKvYFYNY&dq=%22thomson%20consumer%20electronics%22%20subidiary&pg=PA87&v=onepage&q=%22thomson%20consumer%20electronics%22%20subidiary&f=false</p>
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Toshiba America, Inc. owned and controlled by Defendant Toshiba Corporation	Toshiba Corporation. Annual Report 1999, at 47, 68, 70 of 72 available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar1999/6502e.pdf
	Toshiba Corp. Annual Report 2000 at 45, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2000.htm
Toshiba America, Inc.	Toshiba Corp. Annual Report 2001 at 39, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2001.htm
	Toshiba Corp. Annual Report 2002 at 43, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2002.htm
Toshiba America, Inc.	Toshiba Corp. Annual Report 2003 at 35, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2003.htm
	Toshiba Corp. Annual Report 2004 at 43, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2004/ar2004e.pdf
Toshiba America, Inc.	Toshiba Corp. Annual Report 2005 at 52, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2005/ar2005e.pdf
	Toshiba Corp. Annual Report 2006 at 56, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2006/ar2006e.pdf
Toshiba America, Inc.	Toshiba Corp. Annual Report 2007 at 76, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2007.htm
	Toshiba Corp. Annual Report 2008 at 78, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2008.htm
Toshiba America, Inc.	Toshiba Corp. Annual Report 2009 at 64, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2009.htm
	Toshiba Corp. Annual Report 2010 at 71, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2010.htm
Toshiba America, Inc.	Toshiba Corp. Annual Report 2011 at 75, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2011/ar2011e.pdf
	Toshiba Corp. Annual Report 2012 at 80, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2012/ar2012e.pdf
Toshiba America, Inc.	Toshiba Corp. Annual Report 2013 at 82, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/ar2013/ar2013e.pdf
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Intel Corp., et al., Case 2:07-cv-00488-MHS</i> , March 6, 2008, [E.D. Texas]
Toshiba America, Inc.	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Triphoton Touch Technologies v. Dell, Inc. et al.</i> , August 20, 2008, Case 6:07-cv-00546 LED [E.D. Texas]
	Toshiba America, Inc. and Toshiba America Information Systems, Inc., Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Northpeak Wireless LLC v. 3Com Corporation, et al.</i> , Case 5:08-cv-01813-JPI, October 27, 2008 (N.D. Alabama, Northeast Division)
Toshiba America, Inc.	Toshiba America, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Mogil Corporation and Massachusetts Institute of Technology v. Seagate Technology et al.</i> , Case 1:08-cv-00940-HB, February 2, 2009 [D. Delaware]
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Point Technologies, Inc. v. Intel Corporation, et al.</i> , Case 1:09-cv-00026-SLR, June 1, 2009 [D. Delaware]
Toshiba America, Inc.	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Innovative Biometric Technology, LLC v. Lenovo (United States), Inc., et al.</i> , Case 9:09-cv-81046-KLB, December 14, 2010 [S.D. Fla.]
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Walker Digital, LLC v. Ayre Acoustics, Inc., et al.</i> , Case 1:11-cv-00321-LPS, Corporate Disclosure, June 10, 2011 [D. Delaware]
Toshiba America, Inc.	Toshiba America, Inc. Certificate of Interested Persons and Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Brandywine Communications Technologies, LLC v. Toshiba Corporation and Toshiba America, Inc.</i> , Case 6:11-cv-01856-CEH-DAB, December 16, 2011 (M.D. Fla.)
	Toshiba America Information Systems, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>FastVDO, LLC v. Apple, Inc., et al.</i> , Case 1:11-cv-00797-RGA, December 19, 2011 [D. Delaware]
Toshiba America, Inc.	Toshiba Corporation et al. Statement Pursuant to Rule 7.1 in <i>HSM Portfolio LLC and Technology Properties Limited LLC v. Fujitsu Limited, et al.</i> , Case 1:11-cv-00770-RGA, Dkt. 161, January 18, 2012, [D. Delaware]
	Toshiba America Information Systems Inc., et al. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Adventure, Inc. v. Acer, Inc., et al.</i> , Case 1:11-cv-00588-RGA, Dkt. 87, March 12, 2012, [D. Delaware]
Toshiba America, Inc.	Toshiba Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Graphics Properties Holdings, Inc. v. Toshiba America Information Systems Inc., et al.</i> , May 14, 2012, at 1, Case 1:12-cv-00213-LPS, Dkt. 10, [D. Delaware]
	Toshiba Entities' Motion for Partial Summary Judgment under Illinois Brick in re TFF-LCD (Flat Panel) Antitrust Litigation, MDL No. 1827, Dkt. 3575, September 9, 2011 [N.D. Cal.]
Toshiba America, Inc.	Deposition of Koji Kurosawa, in re: Cathode Ray (CRT) Antitrust Litigation, July 30, 2012 at 123:24-124:4
	Deposition of Richard Huber, in re: Cathode Ray (CRT) Antitrust Litigation, August 1, 2012 at 86:3-9
Toshiba America, Inc.	Deposition of Jay Alan Heinicke, in re: Cathode Ray (CRT) Antitrust Litigation, July 31, 2012 at 150:10-18
	Inside Toshiba, available at: http://www.toshiba.com/ta/about_us.jsp

Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories
August 25, 2014

	<p>Panasonic Corporation 20-F Annual Report filed September 13, 2004, at 12, 22, available at: http://www.sec.gov/Archives/edgar/data/63271/000119312504155264/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 12, 2005, at 12, 18, 126, available at http://www.sec.gov/Archives/edgar/data/63271/000119312505183432/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed September 11, 2006, at 11, 17, 127, available at http://www.sec.gov/Archives/edgar/data/63271/000119312506188347/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed August 30, 2007, at 11, available at http://www.sec.gov/Archives/edgar/data/63271/000119312507192290/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2008, at 14, available at http://www.sec.gov/Archives/edgar/data/63271/000119312508143333/d20f.htm</p> <p>Panasonic Corporation 20-F Annual Report filed June 30, 2009, at 9, available at http://www.sec.gov/Archives/edgar/data/63271/000119312509141165/d20f.htm</p> <p>Toshiba Corp. Annual Report 2003, at 35, 46, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/2003/ar2003e.pdf</p> <p>Toshiba Corp. Annual Report 2004, at 20, 43, 55, 74, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/2004/ar2004e.pdf</p> <p>Toshiba Corp. Annual Report 2005, at 40, 52, 67, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/2005/tar2005e.pdf</p> <p>Toshiba Corp. Annual Report 2006, at 43, 56, 70, available at http://www.toshiba.co.jp/about/ir/en/finance/ar/2006/tar2006e.pdf</p> <p>Business Integration Contract between Matsushita Electric Industrial Co., Ltd. and Toshiba Corporation, January 29, 2003 (TSB-CRT-00018162)</p> <p>Toshiba Press Release 2003-1 29 Matsushita and Toshiba Announce Outline of New CRT Joint Venture, available at http://www.toshiba.co.jp/about/press/2003_01/pr2902.htm</p> <p>Article, "Matsushita, Toshiba Advances CRT Joint Venture", March 28, 2003, available at: http://www.twice.com/news/matsushita-toshiba-advances-crt-joint-venture-2</p> <p>Notice on European Commission's Decision Concerning the Business of Color Picture Tubes, December 6, 2012, available at: http://www.toshiba.co.jp/about/ir/en/news/20121206.pdf</p> <p>Deposition of Takashi Nakano, In Re: Cathode Ray (CRT) Antitrust Litigation, July 13, 2012 at 33:9-37:11, 42:23-43:10</p> <p>Deposition of Tatsuo Tobinaga, In Re: Cathode Ray (CRT) Antitrust Litigation, July 16, 2012 at 18:12-19:2, 21:1-4, 115:20-22</p> <p>Deposition of Ayumu Kinoshita, In Re: Cathode Ray (CRT) Antitrust Litigation, February 5, 2013 at 36:4-7</p> <p>Deposition of Hun Sul Chu, In Re: Cathode Ray (CRT) Antitrust Litigation, February 11, 2014 at 20:1-2, 126:6-12</p> <p>Article, "Closure of MT Picture Display (M) Sdn. Bhd.", July 26, 2006, available at: https://www.toshiba.co.jp/about/ir/en/news/20060726.htm</p>
<p>Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (in/k/a MT Picture Display Co., Ltd.)</p>	

<p>Toshiba America Consumer Products, LLC (f/k/a Toshiba America Consumer Products Inc.)</p>	<p>Toshiba America Consumer Products, LLC owned and controlled by Toshiba America, Inc.</p>	<p>Toshiba America Consumer Products, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Parental Guide of TX v. Thomson Inc. et al.</i>, Case 2:03-cv-00022-TJW, Dkt. 22, May 1, 2003 (E.D. Texas)</p> <p>Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Digital Choice of Texas, LLC v. Sichuan Changhong Electronic Co., Ltd. et al.</i>, Case 2:05-cv-00195-TJW, Dkt. 57, July 15, 2005 (E.D. Texas)</p> <p>Toshiba Corporation Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Donald Erler v. Toshiba America, Inc. et al.</i>, Case 1:07-cv-02304-SMG, Dkt. 7, August 8, 2007 (E.D.N.Y.)</p> <p>Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Lawrence Mann and Robert Stewart v. Toshiba America Consumer Products, L.L.C. and Toshiba America, Inc.</i>, Case 2:07-cv-03854-JAG-MCA, Dkt. 8, October 30, 2007 (D.C. N.J.)</p> <p>Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Bradley J. Kreisler v. Toshiba America Consumer Products, L.L.C. and Toshiba Corporation</i>, Case 3:08-cv-00260-JPG-CJP, Dkt. 10, May 9, 2008 (S.D. Illinois)</p> <p>Toshiba America Consumer Products, LLC Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Infusion Asp v. Toshiba America Consumer Products, LLC</i>, Case 2:08-cv-00427-JDH-TPK, Dkt. 8, July 14, 2008 (S.D. Ohio)</p> <p>Toshiba America, Inc. Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Anvik Corporation v. IPS Alpha Technology, Ltd. et al.</i>, Case 1:08-cv-04036-AKH-LMS, Dkt. 04, July 31, 2008 (S.D.N.Y.)</p> <p>Corporate Disclosure Statement Pursuant to Rule 7.1 in <i>Promote Innovation LLC v. Toshiba Corporation et al.</i>, Case 2:10-cv-00100-TJW, Dkt. 38, June 21, 2010 (E.D. Texas)</p> <p>Inside Toshiba, available at: http://www.toshiba.com/ia/about_us.jsp</p> <p>Article, "Toshiba America Consumer Products Selects Waggener Edstrom Worldwide as Agency of Record for North America Consumer Products", June 10, 2009, available at: http://www.pnwswire.com/news-releases/toshiba-america-consumer-products-selects-waggener-edstrom-worldwide-as-agency-of-record-for-north-america-consumer-products-62080357.html</p> <p>Article, "OSHIBA'S REGZA® TV WINS FIRST-EVER PC MAGAZINE GREENTECH HDTV AWARD", December 4, 2008, available at: http://www.meritcenterinteractive.com/recycling/42zv540award.html</p> <p>Article, "Toshiba Announces Innovative Campaign With Dark Horse Comics and USA TODAY", June 16, 2010, available at: http://www.redbrit.com/news/entertainment/1880250/toshiba_announces_innovative_campaign_with_dark_horse_comics_and_usa/#Gvrfu8y1jR2pEU99</p> <p>Article, "Toshiba America Consumer Products Announces Appointment of Atsushi Murasawa as President and CEO", April 13, 2009, available at: http://www.bloomberg.com/apps/news?pid=newsarchive&sid=4x3uamcwnlU</p> <p>See entry for Toshiba America, Inc., <i>infra</i>.</p> <p>See entry for Toshiba America, Inc., <i>infra</i>.</p>
<p>Toshiba America Consumer Products, LLC (f/k/a Toshiba America Consumer Products Inc.)</p>	<p>Toshiba America, Inc. is controlled by Defendant Toshiba Corporation</p> <p>Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/a MT Picture Display Co., Ltd.)</p>	<p>Toshiba America, Inc. is controlled by Defendant Toshiba Corporation</p> <p>Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/a MT Picture Display Co., Ltd.)</p>

Toshiba America Information Systems, Inc.	<p>Article, "Toshiba America Information Systems Deploys Oracle® Applications to Provide a "Flexible Foundation for the Future", May 1, 2006, available at: http://www.oracle.com/us/corporate/press/D16516_EN</p> <p>Press Release, "Toshiba Upgrades Kirabook with 4th Generation Intel Processors", 2014, available at: http://www.toshibapresscenter.com/press-releases/toshiba_upgrades_kirabook.pdf</p> <p>Press Release, "Toshiba America Appoints New National Sales Manager", May 20, 2005, available at: http://www.toshibacameras.com/news/pr/pi-05-20-2005.pdf</p>	Toshiba America Information Systems, Inc. owned and controlled by Toshiba America, Inc.
Toshiba America Information Systems, Inc.	<p>Article, "Toshiba and GreatAmerica Form Strategic Relationship To Deliver Financing Strategies for Toshiba Telecom and VoIP Systems", November 16, 2004, available at: http://www.greatamerica.com/news/toshiba-and-greatamerica-form-strategic-relationship-to-deliver-financing-strategies-for-toshiba-telecom-and-voip-systems.aspx</p> <p>Article, "Toshiba America Information Systems Inc. Names New President", June 23, 1997, available at: http://www.etimex.com/document.aspx?doc_id=1210590</p>	Toshiba America Information Systems, Inc. owned and controlled by Defendant Toshiba Corporation
Toshiba America Information Systems, Inc.	<p>TAIS Job Posting, "Senior Attorney", Undated, available at: http://www.ochar.org/Portals/0/pdf/JOB-TAISeniorAttorney.pdf</p> <p>Deposition of Yoshiaki Uchiyama, In Re: Cathode Ray (CRT) Antitrust Litigation, August 1, 2012 at 12-5-7</p> <p>Deposition of Richard Huber, In Re: Cathode Ray (CRT) Antitrust Litigation, August 1, 2012 at 85-18-86,2</p> <p>See entry for Toshiba America, Inc., <i>infra</i></p>	Defendant Toshiba Corporation owned and controlled joint venture Defendant Matsushita Toshiba Picture Display Co., Ltd. (n/k/a MIT Picture Display Co., Ltd.)

MEETING DATE	LOCATION	CITY	LG	DEC /YR	SDI	MT	MEC	MT	MTC	MT	TSB	PMS	LPD	MTPO	TEXT	BLACC	IRB	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	REG BATES	DEPOSITIONS	DEPOSITION TESTIMONY
1995-1996	Taiwan Taipei		X	X	X							X										PMS David Chung PMS Peter Lin CPT CC Lu LGL Mr. Lee SDP Mr. Lee LGL Mr. Lee	n/a	Pd Lee Lee 79 17 79-88	
1995-1996	Taiwan Taipei		X																			LGL P/Lee CPT CC Lu	n/a	Pd Lee Lee 105-107	
2/14/1995			X		X																	LGL Hao Mei Ha, Sung Kook Sung, Rak Jun Kim, LG Choong Bae Kim, Chung Gi Kim, Moon Bong Cho	SDCEI-00862208	Dae Lee Lee 141 2 144 21	
3/11/1995	Corona				X																	LGL Oh Sung Kwon, Dae Lee Lee Dae Lee Lee, Young Lee Kim, Im Sung Kim	SDCEI-00862311	Dae Lee Lee 146 3 150 18	
3/22/1995			X		X																	CPT JS Lu CPT Chen Mei Hsieh CPT Section Chief Dong	CHUD0028877-878	JS Lu 203 208	JS Lu Dep Vol. 2, 203 208
5/29/1995	Malaysia		X		X																	CPT JS Lu CPT Vincent Lee LGL Mr. B K. Moon LGL Mr. Kim LGL Mr. Tam	CHUD0028933 941	JS Lu 14-78 Dep. Vol. 2, 247 250 Dep Vol. 2, 282 283	
6/22/1995	Amsterdam, Netherlands											X									X	THOM Alan Clement PMS Peters PMS Mr J.H. Pos CPT CC Lu CPT Tony Chen CPT L.Y. Lin CPT Tony Cheng RSD Specialist Yen RSD Generalist Chingang Yin Japan President Li Department Manager Luo	HDP CRTX0055626		
8/17/1995			X																			CHUD0028873	C.C. Lu	C.C. Lu, Dep Vol. 1, 110 117	
8/16/1995	Malaysia		X		X																	CPT JS Lu CPT Christina Hsieh (Chun Shen) CPT Vincent Lee LGL Mr. D.H. Lee LGL Mr. Moon LGL Mr. Goo LGL Mr. Kim LGL Mr. Lee CPT CC Lu	CHUD0028869 872	JS Lu 78 85	JS Lu, Dep Vol. 1, 78 85
9/7/1995			X								X											CPT CC Lu CPT Tony Cheng RSD Section Chief Lee Chun Yeu RSD Section Chief Lee Peng Tung CPT Chingang Yin LGL Mr. Lee LGL Mr. Lee	CHUD0028111 313	C.C. Lu	C.C. Lu, Dep Vol. 1, 313 314
10/6/1995	Taiwan		X		X																	CHUD0028853 CHUD0028856	Pd Lee Lee	206	
11/13/1995	Madrid, Spain											X									X	THOM John Nobile THOM Alan Clement PMS Jacques Bouquet PMS Gerard PMS Stephanie PMS Mr J.H. Pos	HDP CRTX0055593		

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MEETING DATE/LOCATION	CPT	LE	OC	SD	HT	MAC	WIT	TVA	PMS	LPD	ATPD	TOT	BACC	INI	SMPL	TAT	SOFT	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPOSITIONS	DEPOSITION TESTIMONY
12/4/1995	X																		CPT Michael Du W1 Assistant Vice President Chen Jen Wang W11 Head of Division Wen-Huan Tseng	CHU00028558	C.C. Lu	C.C. Lu, Dep. Vol. 1, 314-115
12/5/1995		X																	CPT Jason Lu CPT Tony Du CPT General Manager/Asst. Dept. Mr. C.G. Kim CPT Asst. Manager/Asst. Dept. Mr. C.G. Kim CPT Rep. Mr. K. L. Mr. Mark Tan	CHU00028530-933	C.C. Lu J.S. Lu	C.C. Lu, Dep. Vol. 1, 115-116 J.S. Lu, Dep. Vol. 2, 263-263
1/20/1996				X	X														W11 Eddy Lin SD1 Kim	HDP CHT0023646	Michael K. Kobayashi Kobayashi	JOS [Kobayashi Kobayashi]
3/7/1996-SEDA				X															CPT J.S. Lu CPT Christina Hsieh SED Mr. Park	CHU0002841-843	J.S. Lu	J.S. Lu, Dep. Vol. 1, 18-46 Dep. Vol. 2, 250-251
3/9/1996	X							X											CPT President TSB Mr. Fumazra TSB Mr. Sunaga TSB Mr. Yasuoka	CHU00028302-304	C.C. Lu	C.C. Lu, Dep. Vol. 2, 334-336
4/23/1996 Malaysia	X			X															CPT Lu (Director) CPT Hsieh, Chun-Mei (Christina) WEC Tomin, (Mr.) WEC Vasil, (Mr.)	CHU00028524	Jason Lu	at 66-89
4/29/1996	X							X											CPT Michael Du TSB Mr. Fumazra TSB Mr. Kim Chun Yeu WEC Hsu WEC Chung WEC Huang CPT Lu CPT Cheng CPT Du CPT Lu (Director) CPT Cheng (Head of Division) CPT DUL Chang Yuen (Section Chief) WEC Hsu, Chien-Tien (Section Chief) WEC Chang, Te-Hau	CHU00028300-301	C.C. Lu	C.C. Lu, Dep. Vol. 2, 117-118
5/6/1996-Taiwan	X																		CPT Lu (Director) CPT Cheng (Head of Division) CPT DUL Chang Yuen (Section Chief) WEC Hsu, Chien-Tien (Section Chief) WEC Chang, Te-Hau	CHU00028521	Allen Cheng (Zhong) Michael Hsu	Cheng at 78 Hsu at 102
5/17/1996	X	X	X	X															CPT J.S. Lu CPT Christina Hsieh SED Mr. Park (Sales Senior Manager) CPT J.S. Lu Qian, Mr. H.C. Moon Qian, Mr. H.T. Lin	CHU0002809-810	J.S. Lu	J.S. Lu, Dep. Vol. 2, 221-225
5/24/1996-CPT Malaysia	X		X																CPT J.S. Lu CPT Christina Hsieh LG Mr. Bai et al	CHU0002808-969	J.S. Lu	J.S. Lu, Dep. Vol. 2, 225-230
6/12/1996-CPT Malaysia	X	X																	CPT J.S. Lu CPT Christina Hsieh LG Mr. Bai et al	CHU00028912-914	J.S. Lu	J.S. Lu, Dep. Vol. 1, 90-96 Dep. Vol. 2, 263-263
7/18/1996-TOT	X							X											CPT J.S. Lu CPT Ms. Christina Hsieh TSB Mr. Sunaga	CHU0002895-296	J.S. Lu	J.S. Lu, Dep. Vol. 1, 96-99 Dep. Vol. 2, 262-267

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MEETING DATE-LOCATION	CPT	LG	DEC /YR	SDH	HRT	AMEC	MRT	TSS	PMS	LPD	MTPO	YDST	BMCC	INI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	REG. MATS	DEPONENTS	DISPOSITION TESTIMONY
8/21/1996	X			X															CPT C.C. Lu CPT Michael Du CPT C.Y. Lin CPT Tony Chen SOD Mr. D.Y. Sun SOD Mr. Hoo-Moh Ha	CHU0002803-804	C.C. Lu	C.C. Lu, Dep. Vol. 1, 109-112
9/23/1996 HKS Asia Tower Office	X				X														HRT Senior Manager Chung-Chen Chang CPT Director Du, Senior Manager Cheng-Ching-Yuan (Michael) Du	CHU0002800-01E	C.C. Lu, Kazuhiko Sakahara	278-21 (Kazuhiko Sakahara)
10/9/1996	X							X											CPT Lu (Director), Du, Cheng-Yuan (Michael) Tsub. Wakayama (Department Manager), Yamamoto (Section Chief), Daisen (Assistant Vice President), Lu (Section Chief)	CHU0002891	Yoshi Yamamoto	152-2-161-25
10/17/1996		X	X	X														X	SOD Dong-Hun Lee, Dae-Eul Lee, Han-Sul Chu (Chair), Bok-Hung, Sing-Chul Yoon, Dae-Sil Lee, LG-Chung-Kim, Choi-Ho Lee	SOCT-0086221	Dae-Eul Lee	151-8-155-11
10/24/1996 (Taiwan)	X	X																	CPT Mr. Lu CPT Cheng-Yuan Du LG, KS Huh LG, JM Park LG, PJ Lee	CHU0002899 CHU0003106	Phil Lee	111
10/30/1996 (Taiwan)	X				X														MTC, Hsu MEC, Chang CPT Cheng (Edward) CPT Du (Michael) CPT Cheng-Ling, Yun (Edward) MEC, Hsu, Chia-Yen (Section Manager) MEC, Chang, Yu-Hao (Head of Department)	CHU0002851-4	Michael Hsu	at 132
11/21/1996	X						X												CPT Michael Du CPT Tony Cheng	CHU0002839-399	S.J. Yang	S.J. Yang, Dep. Vol. 1, 69-71
11/21/1996	X																		CPT Michael Du HRT Taiwan Branch Senior Manager Chen-Lung Chang	CHU0002839-399	C.C. Lu	C.C. Lu, Dep. Vol. 1, 122-123
11/21/1996 (HKS Taiwan)	X																		HRT, Chang-Chen Chang CPT, Cheng-Yuan (Michael) Du, Ling-Yun (Edward) Cheng	CHU0002839-01E	Kazuhiko Sakahara	282-21 (Kazuhiko Sakahara)
11/23/1996	X		X	X															CPT Chairman Lin CPT Director C.C. Lu CPT Jason Lu CPT President Fang SOD CEO Sun et al Dosen, CEO Yan et al	CHU00028791-793	C.C. Lu	C.C. Lu, Dep. Vol. 2, 353-362
11/23/1996	X	X	X	X															CPT J.S. Lu CPT President CPTM Fang CPT C.Y. Lin CPT C.C. Lu SOD Mr. Sun et al Dosen, Mr. Yan et al	CHU00028786-788	J.S. Lu	J.S. Lu, Dep. Vol. 1, 99-105 Dep. Vol. 2, 252-260
11/25/1996	X			X															CPT Mr. Seniors, Kazuhiko Sakahara SOD, Mr. Na CPT Director Ch-Chun (C.C.) Lu, Jason (Ling-Song) Lu	CHU00028784-01E	Kazuhiko Sakahara	238-10 (Kazuhiko Sakahara)
11/25/1996		X		X				X												SOCT-0086224	Nguyen Chon	98-13

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MEETING DATE	LOCATION	CPT	LG	OEC /PWS	SDI	HIT	BAC	SMT	PMS	TPS	MTPO	TEXT	BARC	BDJ	SMTL	TAT	SOFT	THOM	INDIVIDUAL PARTICIPANTS	REG DATES	DEPOSITIONS	DEPOSITION TESTIMONY
11/21/1996		X			X	X													CPT C.C. Lu CPT Jason Lu HIC Mr. Salathia HIC Mr. Amura SOD Mr. Na	CHU00028396-397	C.C. Lu J.S. Lu	C.C. Lu, Dep. Vol. 1, 83-86 J.S. Lu, Dep. Vol. 2, 252-250
11/26/1996		X			X	X													CPT Jason Lu, CPT C.C. Lu, HIT #14980 Salathia, HIT Mr. Amura, SOD Mr. Na	CHU00028396-01, CHU00028394-01		
11/26/1996					X															SOCI 4086224	Moan Choi	98-13
1997			X	X	X														SDI Margaret Lee, Dongwon Lee, Changhee Jung, Dan Tsai Lee LG Mr. Kim, Moonbong Choi, Young Jung, Heonil Lee Orion Boon Jung Mr. Sangchul Yoon, Tonghyu Oh	SOCI 4086238	Dae Eul Lee	156-1-148-7
35440 HIT Asia Plant, Tacon		X				X													CPT Michael Du, CPT Edward Cheng, CPT C.C. Lu, CPT Tony Cheng, HIT Chang Lung Chang	CHU00028394		
1/15/1997		X	X																CPT Mr. Lin CPT Wen Chun Cheng LG Kwong Sui Hue LG Zong Min Lin LG Zhen Zi Lin LG Pilee	CHU00028394	PA Lee Lee	188
1/28/1997		X		X	X														CPT C.C. Lu CPT Michael Du CPT C.Y. Lin CPT Tony Cheng SOD Mr. Na SOD Mr. Na SOD Mr. Lee PMS President Tu Orion Mr. Moon Orion Mr. Hee ed Moon	CHU00028768	C.C. Lu	C.C. Lu, Dep. Vol. 3, 515-517
2/24/1997 Taiwan Taipei		X	X																CPT Mr. Lu CPT Yu Shuen Lu CPT Cheng Yuen Du LG P. Lee	CHU00028957	PA Lee Lee	210
2/24/1997		X			X														CPT C.C. Lu CPT Michael Du SOD Tager President Da Wan Ra SOD Manager Joon Youn Moon SOD JAY Lee	CHU0002057-058	C.C. Lu	C.C. Lu, Dep. Vol. 2, 377-373

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MEETING DATE	LOCATION	CPT	LG	DEC /PM	SDI	HRT	AMEC	DMT	TLSB	PMS	LPD	MTPO	TCST	BRAC	IRI	SMITL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	MEG BATES	DEPOSITIONS	DEPOSITION TESTIMONY
2/25/1997		X	X		X					X										CPT C.C. Lu CPT Michael Du CPT President Lin CPT Plant Manager Chen CPT Senior Manager Cheng 1000 Mr. Pei Song 1000 Mr. Yoon 1000 Mr. Lu 1000 All together 7 members LG Taipei President Lin PMS Market Sales Senior Manager Tzeng	CH400018760-762	C.C. Lu	C.C. Lu Dep. Vol. 1, 128-135
3/4/1997		X					X													MIC. Hu MIC. Chang CPT Cheng (Edward) CPT Cheng (Tony) CPT Du +WISACPT Cheng (Senior Manager) CPT Du, Cheng, Ling Yun (Edward) CPT Cheng, Ling Yun (Edward) MIC. Xu, Zhu-Yan (Section Chief) MIC. Zhang, Yu-Hao (Director) PMS-Fred Hovey and Patrick Canavan. SON L. I. Kim, SON H. H. Hwang and SON C. M. Son MIC. Zhang (Chang) LG Lee Jennell Moon PMS. Zeng HRT. Chung Cheng, Wen-Chun (Tony) Du HRT. Jian-Lang Zhang HRT. Zhang, Jian-Lang LG. Lee, Pi-Jue MIC. Zhang, Yui-Hao DEC. Moon, Jong Hee PMS. Zeng, Huan-Kong SON. Ha, Hoo Mok SON. Lee, Kyung-Sik SON. Lee, Gye-Mun	CH400018767	Allen-Chang (Zhong) Michael Hu	Allen Chang (Zhong) 103. M. Lee at 140
3/9/1997					X						X									Patrick Canavan. SON L. I. Kim, SON H. H. Hwang and SON C. M. Son MIC. Zhang (Chang) LG Lee Jennell Moon PMS. Zeng HRT. Chung Cheng, Wen-Chun (Tony) Du HRT. Jian-Lang Zhang HRT. Zhang, Jian-Lang LG. Lee, Pi-Jue MIC. Zhang, Yui-Hao DEC. Moon, Jong Hee PMS. Zeng, Huan-Kong SON. Ha, Hoo Mok SON. Lee, Kyung-Sik SON. Lee, Gye-Mun	10102027286	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 91-25 102-17
3/12/1997	Samlung's Taiwan office	X	X	X	X	X	X			X										CPT: CPT. Cheng-Yuan Du HRT. Jian-Lang Zhang HRT. Zhang, Jian-Lang LG. Lee, Pi-Jue MIC. Zhang, Yui-Hao DEC. Moon, Jong Hee PMS. Zeng, Huan-Kong SON. Ha, Hoo Mok SON. Lee, Kyung-Sik SON. Lee, Gye-Mun	CH400018755	Allen-Chang (Zhong)	Allen Chang (Zhong) 103. M. Lee at 111
3/19/1997		X	X	X	X					X										CPT C.C. Lu CPT Michael Du CPT President Lin 1000 Mr. N. S. Lee 1000 Mr. Otto Lee PMS. Mr. Muan-Bala PMS. Mr. Tzeng Cheng, Mr. Moon Cheng, Mr. Kim	CH400018752-754	C.C. Lu	C.C. Lu Dep. Vol. 1, 96-99
3/26/1997		X			X					X										CPT C.C. Lu CPT Director Yang CPT Michael Du 1000 Mr. Ha 1000 Mr. Lu 1000 Mr. Lee PMS. Director Zeng	CH400018746-748	C.C. Lu S.J. Yang	C.C. Lu Dep. Vol. 1, 125-135 S.J. Yang Dep. Vol. 1, 71-80

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MEETING DATE	LOCATION	CPT	LG	OEC /TOW	SDA	HT	MEC	WOT	TIS	PMS	LPO	MTPS	TECP	BMCC	ORI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	MEG DATES	DEPOSITIONS	DEPOSITION TESTIMONY
4/2/1997		X																		CPT C.C. Lu CPT Michael Du TSB Mr. Lu Yang TSB Mr. Hong TSB Mr. Song	CH00008788-785	C.C. Lu	C.C. Lu, Dep. Vol. 1, 126-128
4/23/1997		X	X							X										CPT Yang CPT Lu, Chin-Chun (C. J. Director) CPT Yang, Sheng-Jen (S. J. Director) CPT Du, Cheng-Yuan (Michael) MEC Yu, Ku-Zhu (Section Head) MEC Koga, (Mr.)	CH00008503	V.J. Yang	S.J. Yang, Dep. Vol. 1, 40-83, Vol. 1, 417-420
4/23/1997		X	X							X										CPT C.C. Lu CPT Michael Du SOD Mr. Ha SOD Mr. Ha SOD Mr. M.S. Lee SOD Mr. Otto Lee PMS Mr. Song Orion Mr. Moon CPT C.C. Lu CPT C.Y. Lin CPT Edward Cheng MEC Chen-Lung Chang	CH00008740-743	C.C. Lu S.J. Yang	C.C. Lu, Dep. Vol. 1, 128-129 S.J. Yang, Vol. 3, 414-417
4/26/1997		X																		CPT C.C. Lu CPT Edward Cheng MEC Chen-Lung Chang	CH00008793	C.C. Lu	C.C. Lu, Dep. Vol. 1, 129-131
4/29/1997		X																		CPT Cheng (Edward) CPT Du	CH00008505	Michael Hu	at 147
4/29/1997		X																		HET, Cheng Chen-Chung CPT Cheng-Yuan (Michael) Du, Ling-Yun (Edward) Cheng	CH00008793 01E	Kazuhiko Sakashita	279-12 (Kazuhiko Sakashita)
5/2/1997		X																		CPT Senior Manager Cheng CPT Edward Cheng CPT Michael Du SOD Meng-Hsi SOD Jamin Li CPT C.C. Lu	CH00008734-735	C.C. Lu	C.C. Lu, Dep. Vol. 1, 131-132
5/9/1997		X	X							X										CPT Michael Du SOD DY Kim SOD Mr. Ha SOD Mr. H.S. Lee LG Mr. Lin Orion Mr. Moon PMS Mr. Zeng	CH00008730-733	C.C. Lu	C.C. Lu, Dep. Vol. 1, 100-102
5/20/1997		X	X							X										CPT C.C. Lu CPT Michael Du SOD Mr. Ha SOD Mr. Teon PMS President Sung PMS Director Liang LG, APP Lu	CH00008715-717	C.C. Lu	C.C. Lu, Dep. Vol. 1, 137-133
5/20/1997		X																		CPT Ms. Hsieh SOD Mr. Park SOD Mr. Moon SOD Mr. Joseph K2 SOD Ms. Orah	CH00008723-724	J.S. Lu	J.S. Lu, Dep. Vol. 1, 109-113
5/23/1997		X																		CPT J.S. Lu CPT Christina Hsieh Ms. MEC, Mr. Toman	CH00008501-502	J.S. Lu	J.S. Lu, Dep. Vol. 2, 113-117

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MEETING DATE	LOCATION	CPT	LG	OEC /YH	SDI	HRT	SAC	AMT	TISB	PHS	LPO	MTPO	TORT	BAOCC	HU	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	WEB BATES	DEPOSITIONS	DEPOSITION TESTIMONY
5/7/1997			X						X											Enishi, Wajayana Kimura SOCI 0086245	Dae Lu Lee	158 21 182 16	
7/8/1997		X			X															CPT Director S.J. Yang CPT Michael Du CPT Mr. Hsieh SOD Mr. Ha SOD APV Mr. Lee CHU00028713-212	S.J. Yang	S.J. Yang, Dep. Vol. 1, 83-87	
7/9/1997	Paris, France									X									X	THOM Alan Clement PHS Jell H. Post PHS Palmer HDP CPT00051190			
7/16/1997		X			X				X	X										CPT C.C. Lu CPT S.J. Yang CPT Michael Du TSB Mr. Matsuda TSB Mr. Ohmori TSB Mr. Fukumala CHU00028777	C.C. Lu	C.C. Lu, Dep. Vol. 2, 514-515	
7/16/1997		X			X				X											CPT Director C.C. Lu CPT S.J. Yang CPT Michael Du TSB Mr. Matsuda TSB Mr. Ohmori TSB Mr. Fukumala CHU00028777-278	S.J. Yang	S.J. Yang, Dep. Vol. 1, 87-90	
7/18/1997		X			X															CPT Michael Du SOD Taipei President Hu SOD APV Lee SOD Gu Gie Lee CHU00028707-710	C.C. Lu	C.C. Lu, Dep. Vol. 2, 134-135	
8/18/1997		X			X															CPT C.T. Lin CPT C.C. Lu CPT S.J. Yang SOD Mr. Hu SOD Mr. Hu SOD Mr. Lee SOD Mr. Kim CHU00028701-703	C.C. Lu	C.C. Lu, Dep. Vol. 1, 135-137	
8/19/1997		X			X															Sung Kyu Park (SDI); J. Lee Chulha; Saungsoop Moon SOCI 0086247	Se Park		
9/12/1997		X					X													MIC Hu MIC Chung CPT Cheng (Edward) CPT Du CHU00026497	Allen Chang (Zhang) Chang at 119; Hu at Michael Hu		
9/25/1997		X							X											CPT J.S. Lu TSB Mr. Sunaga TSB Mr. Hano TSB Mr. Sato CPT Director S.J. Yang CPT Director C.C. Lu CPT Michael Du SOD Mr. N.S. Lee SOD Mr. Hu SOD Mr. Yang Meng Lee CHU0002873-274	J.S. Lu	J.S. Lu, Dep. Vol. 2, 117-121	
10/9/1997		X			X					X										CPT Jerry Lin CPT Director C.C. Lu CPT Michael Du CPT President C.T. Lin CPT Executive Manager Chen CPT Head of Division S.J. Yang SOD CSIS Shiao SOD Hong Kong Branch President Zhong SOD Mr. D.Y. Kim SOD Mr. Hu SOD Mr. Lee CHU00028693-690	S.J. Yang	S.J. Yang, Dep. Vol. 2, 99-98	
10/20/1997		X			X															CPT Michael Du CPT President C.T. Lin CPT Executive Manager Chen CPT Head of Division S.J. Yang SOD CSIS Shiao SOD Hong Kong Branch President Zhong SOD Mr. D.Y. Kim SOD Mr. Hu SOD Mr. Lee CHU00028693-690	C.C. Lu	C.C. Lu, Dep. Vol. 2, 117-119	

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MEETING DATE	LOCATION	CPT	LG	DEC	SOI	MT	REC	MT	MT	TSB	PHS	LPD	MTPO	TOST	BARC	ISI	SMITL	TAT	SORY	THOM	PARTICIPANTS	REG. BATES	DEPOSITIONS	DEPOSITION TESTIMONY
10/30/1997	SDD Taipei	X			X																CPT Director C.C. Lu CPT Michael Du SDD Taipei President Hu SDD APP Lee PHS President Song	CHU0002687-688	C.C. Lu 139-141	C.C. Lu, Dep. Vol. 1, 139-141
10/31/1997		X					X														MIC Chang-Hu, Bo Chang-Ling (Natsuhidea Tawara (SOI), CPT Du, Chang (Edward), Mr. Lin	CHU0002695	Allen Chang (Zhong) Michael Hu	Chang at 121, 129, Hu at 133
11/7/1997	Marjorie's Team [office]	X					X						X								CPT Lu (Director) CPT Yang (Director) CPT Du, Chang-Yuan (Michael) MIC Xu, Zhong (Assistant Manager) MIC Zhang, Xu Hao (Director)	CHU0002690-492	C.C. Lu, Allen Chang (Zhong), Hu	Hu at 141-42, Chang at 129-30, Hu at 156
11/24/1997		X						X													CPT Director C.C. Lu CPT Michael Du SDD Taipei President Hu PHS Senior Manager Xu Li Lin LG Mr. J.M. Park LG VP Bo-Cai Li	CHU0002674-676	C.C. Lu	C.C. Lu, Dep. Vol. 1, 142-144
12/02/1997		X						X													CPT J.S. Lu CPT Director C.C. Lu CPT C.C. Lu CPT Michael Du CPT S.J. Yang SDD Mr. Hu SDD Mr. H.S. Lee Damon, Mr. Moon	HDP-CHU00025612 CHU0002679-781	Michael Hu Michael H. Kobayashi J.S. Lu J.S. Lu, Dep. Vol. 1, 129-131	Michael Hu Michael H. Kobayashi J.S. Lu, Dep. Vol. 1, 129-131
12/2/1997		X																			CPT Director S.J. Yang CPT Director C.C. Lu CPT Michael Du SDD Mr. Hu SDD Mr. H.S. Lee Damon, Mr. Moon	CHU0002670	C.C. Lu	C.C. Lu, Dep. Vol. 2, 537-538
12/2/1997		X																			CPT Director S.J. Yang CPT Director C.C. Lu CPT Michael Du SDD Mr. Hu SDD Mr. H.S. Lee Damon, Mr. Moon	CHU0002670-671	S.J. Yang	S.J. Yang, Dep. Vol. 1, 98-103
12/16/1997	Taipei		X		X																Damon, Bok (Huang, Hong Eru Oh, Dae Shik Lee Yong (Huang, Seung Youl Shin SOI - Dong Hoon Lee, Chang Hee Chang, Dae Eui Lee	SOCHI-0086248, SOCHI- 0086249	Dae Eui Lee	SOCHI-0086248, SOCHI- 0086249
12/24/1997		X					X														MIC Chang-Hu CPT Hsu, Chen-Yen (Assistant Manager) CPT Chang, Yu Hao (Head of Division) MIC	CHU00026487	Allen Chang (Zhong) Michael Hu	Chang at 150, Hu at 158
12/24/1997			X		X																SOI - Dae Eui Lee	SOCHI-0086253	Dae Eui Lee	SOCHI-0086253
1998 (2001)		X	X	X	X																Seung Hee Lee (SOI), Song, Michael (SOI), Dae Eui Lee (SOI), Ae In Lee (SOI)	N/A	J. Lee	Ae In Lee Vol. 1 25-24, 26-2, 28-30-29, 1, 29-34-30-30, 37-32- 37-33, 62-5-62-9, 65-31-66-3, 66-7, 66-31
1998/1999	Taiwan	X			X																J.Y. Youn	SOCHI-0086253	J.Y. Youn	43-01-00
1998	Chung Island, South Korea				X					X											Toshiko Yamamoto, Yasuki, Toshio SOI: D.Y. Kim, Another SOI employee	SOCHI-0086253	Yasuki Yamamoto	117-22-121-23, 137- 21, 241-14

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MEETING DATE	LOCATION	CPT	LG	DEC /JST	SDI	MT	MEC	ART	YSB	PMS	LPO	MTPO	TEXT	BANCE	IRI	SANTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPOSITIONS	DEPOSITION TESTIMONY
1998	Hallone, Japan				X				X											Toshio Yamamoto, Yasuaki Yohioka SDP: D.Y. Kim, another SDI employee		Yasui Yamamoto 21-141-14	317-221-221-137
1998	Taiwan	X	X	X	X															L.Y. Tsoun		L.Y. Tsoun 50-10-518	51-191-14
2/19/1998	Taiwan					X															HEUDUS CR100139915 SDCIT 0086373	Tom Hester	55-191-10m Hester
1/13/1998		X							X											CPT: President C.Y. Lin CPT: Michael Du YSB: Mr. Hamada YSB: Mr. Chihara YSB: Mr. Yang Changliu CPT: Director C.C. Liu CPT: Michael Du CIC: Taipei VP Moon	CHUD00018651-264	C.C. Liu	C.C. Liu, Dep. Vol. 3, 404-411
2/22/1998		X		X																CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDP: Mr. C.W. Luo SDP: Mr. Tsou SDP: Mr. Lee	CHUD00018655-957	C.C. Liu	C.C. Liu, Dep. Vol. 1, 144-145
2/24/1998		X			X															CPT: S.J. Yang CPT: Michael Du SDP: Mr. C.W. Luo SDP: Mr. Tsou SDP: Mr. Lee	CHUD00018656-657	S.J. Yang	S.J. Yang, Dep. Vol. 2, 190-192
3/1/1998	n/a					X													X	THOM: Evelyn Trompach MT: Tom Hester	HEUDUS CR100176427		
3/4/1998	Taiwan	X		X	X															CPT: S.J. Yang CPT: Michael Du CPT: C.C. Liu SDP: Mr. Na SDP: Mr. Ha SDP: Mr. Lee SDP: Mr. H.S. Lee PMS: Mr. Jeong Lin Onion: Mr. Moon	CHUD00018654-655	S.J. Yang	S.J. Yang, Dep. Vol. 1, 103-106
3/11/1998	Taiwan, Japan									X									X	THOM: Giles Tabis THOM: Christian Bascouet PMS: Jacques Bouvier PMS: Fran A. de Bruant PMS: Job Merient	HDP CR100055091, HDP CR100055172		
3/12/1998	Heath Greenfield, S.C. Factory					X													X	MT: Tom Hester, Thom Schmidt THOM: P. Fresh Trompach	HEUDUS CR100126427	Tom Hester	100-04 (Tom Hester)
3/13/1998								X												MT: Mr. Hasegawa, MT: Mr. Oda, MT: Mr. Esmen CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDP: Mr. Che-Hua Ra SDP: Mr. Gie Men Lee	HDP CR100035601 CHUD00018648-650		
3/15/1998		X	X		X				X											CPT: S.J. Yang SDP: Mr. Na SDP: Mr. Ha SDP: Mr. Lee LG Taipei: Mr. Lin LG Taipei: Mr. Park Onion: Mr. Moon	S.J. Yang	S.J. Yang, Dep. Vol. 2, 274-278	
3/20/1998	Taipei office	X	X	X	X															CPT: Michael Du SDP: Mr. Na SDP: Mr. Ha SDP: Mr. Lee LG Taipei: Mr. Lin LG Taipei: Mr. Park Onion: Mr. Moon	CHUD00018645-646	S.J. Yang	S.J. Yang, Dep. Vol. 1, 107-110
4/9/1998	Busan	X			X															CPT: Director C.C. Liu CPT: Michael Du SDP: President Chuan Luo	CHUD00018642-644	S.J. Yang	S.J. Yang, Dep. Vol. 2, 110-115

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MEETING DATE	LOCATION	CPT	LG	DEC /YR	SDI	HIT	MEC	INT	TSB	PHS	LPO	MITPO	TEXT	BACC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG DATES	DEPOSITIONS	DEPOSITION TESTIMONY
4/2/1998		X	X	X																CPT Senior Manager S.J. Yang CPT President C.Y. Lin CPT Director C.C. Liu CPT Michael Du SOD Mr. Sun SOD Mr. Ha SOD Mr. He SOD Mr. An SOD Mr. U	CHUD0028651-652	S.J. Yang	S.J. Yang, Dep. Vol. 1, 115-122
4/2/1998						X													X		HEDUS-CRT00002105	Tom Heiser	174 OG (Tom Heiser)
05/05/1998						X															HOP CRT0003564	Katsumasa Hara	130 16 (Katsumasa Hara)
05/05/1998						X			X										X	HIT Tom Heiser, Thom Schmidt	HEDUS-CRT00002107	Tom Heiser	184 12 (Tom Heiser)
5/18/1998	Taiwan	X							X											CPT Director C.C. Liu CPT Manager Yang CPT Michael Du TSB Mr. Michiharu Yoshino TSB Taipei Mr. Tong Fu TSB Section Chief Yun-Peng Hong	CHUD0028252-253	C.C. Liu	C.C. Liu, Dep. Vol. 1, 145-147
5/18/1998		X		X																CPT Director C.C. Liu CPT Senior Manager Yang CPT Michael Du OIC Mr. Moon OIC Mr. Yang CPT S.J. Yang CPT C.C. Liu CPT Michael Du TSB Mr. Michiharu Yoshino TSB Mr. Fukushima TSB Mr. Yun-Peng Hong TSB Mr. Tong Fu	CHUD0028952-954	C.C. Liu	C.C. Liu, Dep. Vol. 1, 147-148
5/18/1998	Taiwan	X							X											CPT S.J. Yang CPT C.C. Liu CPT Michael Du SOD Na SOD Ha SOD Lee Oren, Tang	CHUD0028252-253	S.J. Yang	S.J. Yang, Dep. Vol. 1, 429-433
6/7/1998	future meeting planned for Taiwan	X	X	X																CPT S.J. Yang CPT C.C. Liu CPT Michael Du SOD Na SOD Ha SOD Lee Oren, Tang	CHUD0026832-634	S.J. Yang	S.J. Yang, Dep. Vol. 1, 122-130
6/7/1998	TAU/TEA Meeting in Osaka							X	X											TSB Wakayama, MIT Tsukamoto, HIT Uchida, MEC Shimoda	HOP CRT00055114		
6/7/1998	Tonsa	X	X	X	X															CPT S.J. Yang CPT C.C. Liu	CHUD0028638	S.J. Yang	S.J. Yang, Dep. Vol. 1, 130-134
7/8/1998	Whispering Gull Club, Alpharetta, GA					X												X		HIT Tom Heiser THOM, Ret. Love, Hans Braun	HEDUS-CRT00166576	Tom Heiser	92 03 (Tom Heiser)
7/11/1998	Third Seven Sports Grill, Norcross, GA					X				X										HIT Tom Heiser, Thom Schmidt, GL, JS PHS Jeff Johnson, Pat Canavan, Jeff Johnson	HEDUS-CRT00166576	Tom Heiser	92 03 (Tom Heiser)
7/13/1998	Harsh Office, Norcross, GA					X				X										HIT Tom Heiser, Thom Schmidt PHS Geert Levens, Pat Canavan, Jeff Johnson	PHIP CRT 081748	Tom Heiser	100 18 (Tom Heiser)
7/13/1998	Harsh, Norcross, GA					X				X										PH Pat Canavan PH Jeff Johnson HIT Tom Heiser HIT Thom Schmidt HIT Geert Levens	PHIP CRT 081748	Jim Smith	Jim Smith Dep. Vol. 1, 249-255
7/16/1998	Massachusetts					X														SDH Lee (possibly)	SDCRT 0086416	Lee In Lee	Lee In Lee 88-94

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MEETING DATE	LOCATION	CPT	LE	OAC	SSA	MT	MEC	MT	YLS	PMS	LPD	MTPO	TCT	BMACE	MR	SMFL	TAT	SORY	THOM	INDIVIDUAL PARTICIPANTS	REG BATHS	DEPOSITIONS	DEPOSITION TESTIMONY
9/7/1998																				SDI: Dae Eul Lee	SOCRT 00864402	Dae Eul Lee	205 20-209-9
9/24/1998																				CPT J.S. Lu CPT Michael Du SDO Mr. K.H. Lee SDO Mr. S.K. Park SDO Mr. Moon SDO Mr. Sun IG Mr. Cho IG Mr. C.S. Moon IG Mr. Y.J. Hong IG Mr. S.Y. Lee Orion Mr. H.C. Moon Orion Mr. B.C. Moon Orion Mr. D.S. Lee Orion Mr. S.R. Oh TCRT Mr. Baanchoo	CHU00019182 264	J.S. Lu	J.S. Lu Dep. Vol. 1, 133-137
9/26/1998	Thailand																				SOCRT 0086441	Dae Eul Lee	209 21-214-22
9/26/1998																				SDI: Michael Sun	CHU00019181	Michael Sun	344 12-145-2
10/9/1998	Laos																			CPT J.S. Lu CPT Du-Huang Sun CPT Alex Kim CPT Gwang-Ho Du CPT Wang-Ho Du PMS Zheng Li Shao PMS President Kim Zhong Sheng PMS Manager Bang Ha SSDO Manager Le Phuong Sa Lee SSDO Phao Yang Orion Tai Sa Tong IG J.B. Park IBI VP Jan She Wei	CHU00010079-683	J.S. Lu	J.S. Lu Dep. Vol. 2, 370-376
10/9/1998																				Joe In Lee (SDI)	SOCRT 0086442	J.B. Lee	
10/13/1998	San's Chris Scottsdale, AZ																			MT: Tom Messer THOM: Mr. Siyong Dooms MEC: Chang, Hui Kuo-Wen Eric CPT Du, Mr. Lin CPT Du, Chang Yuan (Michael) CPT Hsieh, Chun-Mei (Christina) CPT Lin, Tang Yi SDI Assistant Vice President SDI Lee, Joe Min SDI Lee, Ju Chon MT: Mohabli Ho MEC: K. Shomoda	MECUS-CE100180563	Tom Messer	193 05 (Tom Messer)
10/13/1998																					CHU00018459	Michael Hu	Hui Li at 183
11/02/1998																				MT: Mohabli Ho MEC: K. Shomoda	HOP-CH100013660	Mohabli Ho	343 CR (Mohabli Ho)
11/4/1998	Taiwan																			Joe In Lee (SDI)	SOCRT 0086440	J.B. Lee	
11/16/1998	Singapore																			SDI: Sang Kyu Park, Executive Vice President Em, Senior Vice President Em		Dae Eul Lee	215 6-270-3

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MEETING DATE / LOCATION	CPT	LE	OKC / POW	SDI	HT	MAC	MIT	T34	PHS	IPD	ATPO	TORF	DMCC	ISI	SMITL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG DATES	DEPOSITIONS	DEPOSITION TESTIMONY
11/16/1998 Singapore		X	X	X	X														SDI - Sang Kyu Park, Executive Vice President Em, Senior Vice President Em SOCI 0086482			
11/20/1998 HT Akai Plant, Japan	X				X														HRT - Chang Ung Zhang, CPT, C.C. Lu, CPT, Michael Du CHU00028383			
11/24/1998 Korea		X	X	X															SDI - Michael Son, B.F. Lee SDI log responses, SOCI 0086485	Michael Son		101-15-102-14, 151-15-153-11
11/27/1998	X	X	X	X								X							CPT, C.C. Lu CPT, Tony Chen CPT, Michael Du SDO: Mr. E. H. Lee SDO: Mr. D.E. Lee SDO: Mr. Son LG: Mr. Choi LG: Mr. Y1 Jeong LG: Mr. K.Y. Go Orion: Mr. H.C. Moon Orion: Mr. B.I. Jeong Orion: Mr. Jaid Min Orion: Mr. H.S. Oh TCRT: Mr. Boonchoo	CHU0002919-261	C.C. Lu	C.C. Lu, Dep. Vol. 1, 149-151
11/27/1998 Korea	X	X	X	X								X							SDI - Michael Son, D.E. Lee, E.H. Lee, Orion - H.C. Moon, B.I. Chung, K.Y. Go, CPT, C.C. Ryu, TCRT, Boonchoo SDI log responses, SOCI 0086487	Michael Son		101-15-102-14, 151-15-153-17, 153-17-42, 153-102-103-16, 153-21-176-23
11/27/1998 Korea	X	X	X	X								X							SDI - Kwang Ho Lee, Dae Lu Lee, Michael Sohn LG - Hyun Choi, Tong H. Chung, Kyu Young Go Orion - Hee Chul Moon, Bok Il Chung, Sang Hyun Hyun, Sun Iwang DH, Dae Sa Lee Chunghee - C.C. Ryu, Michael Du Thal CRT - Mr. Boonchoo CPT, J.S. Lu CPT, Tony Cheng CPT, Michael Du CPT, Alan Yeh PHS, Shou Lili PHS, Cheng Li Shao PHS, Dong Lu SDO: Mr. D.Y. Kim SDO: M.S. Lee et al Orion: Mr. Moon Orion: Mr. Tong et al Mr. President Ma et al Mr. President Wen-Chang Fan MTC, Wen-Chang Fan MTC, Wen-Chang Fan	SOCI 0086487 (Ea. 665)	Dae Lu Lee	121-1-227-19
12/8/1998 Beijing, China	X	X	X	X					X				X						CPT, J.S. Lu CPT, Tony Cheng CPT, Michael Du CPT, Alan Yeh PHS, Shou Lili PHS, Cheng Li Shao PHS, Dong Lu SDO: Mr. D.Y. Kim SDO: M.S. Lee et al Orion: Mr. Moon Orion: Mr. Tong et al Mr. President Ma et al Mr. President Wen-Chang Fan MTC, Wen-Chang Fan MTC, Wen-Chang Fan	CHU0003068-693	J.S. Lu	J.S. Lu, Dep Vol. 1, 139-140
12/11/1998	X				X														MTC, Cheng Hsu, CPT Du, Cheng (Tony) CPT, Cheng Wen-Chun (Tony) (Manager) CPT, Du, Cheng Yuan (Manager) MTC, Hsu, Chen-Yen (Assistant Manager) MTC, Cheng, Yu-Hao (Assistant Section Chief)	CHU0003453	Allen Chang (Zhang), Michael Hu	Chung II at 170; Hsu II at 177
12/17/1998	X	X																	CPT, S.J. Yang LG, Mr. B.C. Jeon	CHU0003687-688	S.J. Yang	S.J. Yang, Dep. Vol. 1, 139-143

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MEETING DATE	LOCATION	CPT	LG	OC	SDI	HIT	MAC	MET	TSS	PHS	UPD	MTPO	TCT	BACC	HR	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BIG BATES	DEPOSITIONS	DEPOSITION
12/17/1998			X	X	X															SDI Dae Eui Lee	SOCT-0086473	Dae Eui Lee	228-2-249-25
1/20/1999		X				X															HEDUS-CR100151622	Tom Hesser	435-16 (Tom Hesser)
1/26/1999	Rockwood Grn, La					X															HDP-CR100051345	Madhuwala Kobayashi	253 (Kobayashi)
1/27/1999	Terre Point, La					X															HEDUS-CR100166472	Tom Hesser	107-23 (Tom Hesser)
1/27/1999	Terre Point, La					X															HEDUS-CR100166472	Tom Hesser	107-23 (Tom Hesser)
1/27/1999	Terre Point, La					X															HEDUS-CR100098394	Tom Hesser	110-14 (Tom Hesser)
1/28/1999	Samen, China	X			X																CHU00030695-697	J.S. Lu	J.S. Lu, Dep. Vol. 1, 137-138
1/13/1999	U.S.			X	X	X															SOCT-0002536		
1/13/1999	(CPT)	X	X	X	X																CHU00030698-700	C.C. Lu	C.C. Lu, Dep. Vol. 2, 153-154
1/14/1999		X	X	X	X																CHU00030701-704	C.C. Lu	C.C. Lu, Dep. Vol. 1, 154-157 Dep. Vol. 2, 481-487
1/15/1999		X	X		X																SOCT-0086557		
1/15/1999						X															HEDUS-CR100098394	Tom Hesser	110-14 (Tom Hesser)

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MEETING DATE	LOCATION	CPT	LG	OKC	SDI	HIT	MIC	MIT	TIB	PHS	LPO	MTPD	TORT	BACE	DE	SATL	TAT	SOWT	THOM	INDIVIDUAL PARTICIPANTS	MSG DATES	DEPOSITIONS	DEPOSITION TESTIMONY
1/22/1999		X							X											CPT: S.J. Yang TSB: Mr. Yoshino TSB: Mr. Esawano TSB: Mr. Jee HIT: Thom Schmet LG: Bruce Lee, A. Wao.	CH000018240	S.J. Yang Dep. Vol. 3, 420-423	S.J. Yang Dep. Vol. 1, 183-186
1/22/1999	Prison Monitor Facility, Raleigh, N.C.		X			X														HIT: Thom Schmet	HE00001810009394	Tom Heiser	Tom Heiser 110-14 [Tom Heiser]
2/5/1999		X				X														HIT: Dan Mead, PHS: Paul Toma C.C. Lu	HE000018100018744	Tom Heiser	426-05 [Tom Heiser]
2/10/1999										X										CPT: C.Y. Lin CPT: Michael Du	CH000011289	C.C. Lu	C.C. Lu, Dep. Vol. 1, 106-109
2/10/1999		X	X	X	X															Jae In Lee [SDI]	SD000010086561	Jae In Lee	
2/11/1999	Amund				X					X	X										PHC-00001637	Patricia Casanova	Patricia Casanova Dep. Vol. 1, 107-112-120
2/12/1999										X								X		Sony Abbott Sony Rigby Sony Inoue Sony McKee Sony Yamano PHC: J. Smith PHC: S. Langley PHC: S. Alast	PTC-000009640	Jim Smith	Jim Smith Dep. Vol. 2, 256-260
2/12/1999																				CPT: Senior Manager Tom Cheng CPT: Miss Hueh SDI: Mr. Ha SDI: Mr. J.L. Lee SDI: Mr. Berry PHS: Mr. Jerry Lin PHS: Mr. Rosa Hu PHS: Mr. Moon Phon: Mr. Jimmy Kim LG: Mr. Park LG: Mr. H. Song	CH000010113716	C.C. Lu	C.C. Lu, Dep. Vol. 1, 157-158
3/1/1999			X			X														HIT: Thom Schmet, RTH, TS LG: Daniel Lee, Gary Michal, CPT: C.C. Lu CPT: Miss Hueh SDI: Mr. Youn SDI: Mr. Otto PHS: Mr. Jerry Lin PHS: Mr. Lunay LG: Mr. Lu Phon: Mr. Justin Park	HE00001810009394	Tom Heiser	110-14 [Tom Heiser]
3/1/1999		X	X	X	X					X											CH000010120727	C.C. Lu	C.C. Lu, Dep. Vol. 1, 158-160

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